

**Greater Norwich Local Plan**

**Regulation 19  
Representations by  
Respondent Order**

Export: 29th July 2021

Record count: 1315

**23412****Object****Policy 0596R, 4.7****Respondent:** Mr Alan O'Rourke [19825]**Summary:**

Regulation 19 states there will be an additional proposed second site. has never been subject to any consultation and is therefore not legally. The second site should also be rejected because of its impact on local amenities, (schools, medical, etc as well as other more damaging environmental factors)

**Change suggested by respondent:**

Consultation with the appropriate legal authorities is the first step.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

**24095****Object****Policy 5 Homes, Policy 5 Homes****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

The policy's objective of providing a full range of types, tenure and costs of housing to meet varied housing needs is, in principle, supported. In addition, the provision of minimum space standards and requirements for adaptable homes to be provided to improve the quality of life and meet the needs of an aging population is also supported.

**Affordable Housing**

As drafted the policy states that only applications on brownfield sites will be able to challenge affordable housing provision at the application stage. The policy should, in accordance with paragraph 57 of the NPPF recognise that, notwithstanding work to inform a site allocation in the Local Plan, a viability assessment can be submitted at the application stage. The NPPF advises that the weight afforded to the viability assessment at the application stage will be a matter for the decision maker and will have regard to all circumstances in the case, including whether the evidence underpinning the local plan is up to date and whether there has been a change in circumstances since the plan was brought into force.

On this basis, to ensure the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

**Space Standards**

Whilst the intention to adopt the Government's Nationally Described Space Standard (NDSS) is readily acknowledged, it is

essential that the policy explicitly provides the necessary justification, as required by footnote 46 of paragraph 127 NPPF. This clearly states: "Policies may also make use of the nationally described space standard, where the need for internal space standard is justified".

This justification is essential, as strict adherence to space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. For example, in terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow those on lower incomes to afford a property which has their required number of bedrooms. At this stage, notwithstanding the PPG, there would appear to be no robust evidence that would suggest that development below space standards is a particular concern throughout the GNLP area, and that the rigid adherence to NDSS is necessary.

Accordingly, we would suggest that if this element of the policy is to be retained that , as a minimum requirement, the policy should provide some flexibility to recognise need and viability, where necessary.

#### Self & Custom Build

The provision of self and custom build is recognised. However, the threshold that at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots is not considered to be justified.

The threshold would result in the number of self and custom build units provided being substantially in excess of the identified need. As stated at paragraph 282, there are only 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The strategic sites identified on the GNLP i.e. those over 1,000 units, would on their own deliver substantially more than the identified need.

Whilst it is recognised (and welcomed) that the policy includes wording that provision is not required if there is no need, it is suggested that the threshold is reduced to a level which better reflects current demonstrable need.

In addition, to provide clarity the policy, or supporting text, should provide further evidence on what is classified as a self / custom build unit. For example, if a developer provides a potential purchaser with a degree of choice in relation to the layout and design of their unit, such as the reconfiguration of layouts to suit individual requirements, or the provision of foundations, pipework to facilitate an extension at a later date, does this constitute a Custom Build unit for the purposes of the policy?

On this basis, the policy is neither considered to be justified or effective and, therefore, is not sound.

#### Change suggested by respondent:

##### Affordable Housing

The policy should be revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

##### Space Standards

In the apparent absence of the necessary robust evidence to justify it, the policy should, if this element is to be retained, provide some flexibility to recognise need and viability, where necessary.

##### Self and Custom Build

The threshold for on-site provision should be increased to better reflect the demonstrable need. Clarity on the definition of self/custom build should be provided in the policy or supporting text.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

## 24091

## Support

### Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** Abel Homes [16516]

**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]

**Petition:** 2 petitioners

#### Summary:

The GNLP's approach to providing choice and flexibility in terms of housing growth by accommodating 22% more homes than are needed, is supported.

The 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.

The proposed Settlement Hierarchy is fully supported. The identification of Village Clusters as a location for development ensures that a proportion of forecast growth is distributed to sustainable locations in rural areas; an approach that ensures the provision of choice and will assist in enhancing and maintaining the vitality of rural communities. Accordingly, it is wholly appropriate and consistent with Government Guidance that Village Clusters should be identified as the preferred location to accommodate 9% of the housing growth during the period to 2038.

On this basis, the proposed Policy is considered to be sound.

#### Change suggested by respondent:

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**Legally** Yes

**compliant:**

**Sound:** Yes

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24092

Support

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**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

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, and, if applicable, the provision of a Delivery Statement

**Change suggested by respondent:**

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**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24093

Support

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

As detailed in comments relating to Policy 1 – The Sustainable Growth Strategy, the proposed Settlement Hierarchy is fully supported.

Village Clusters, such as Horsham St Faith, are sustainable rural locations that provide access to services, including primary schools, as well as access to employment opportunities and public transport links. Development in these locations will, in accordance with the NPPF, assist in enhancing and maintaining the vitality of rural communities.

Accordingly, it is wholly appropriate that Village Clusters should be identified as locations to accommodate a reasonable amount of growth (9% of the total housing growth) during the period to 2038. It fully supports the GNLP's aspirations of focusing growth in locations with access to jobs and services, whilst supporting a vibrant rural economy.

Horsham St. Faith, which along with Newton St Faith, is identified as a Village Cluster. 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, as well as employment opportunities.

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 and is fully supported.

On this basis, the proposed the Policy is considered to be sound.

**Change suggested by respondent:**

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**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24094

Support

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Abel Homes [16516]

**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]

**Petition:** 2 petitioners

### Summary:

The proposed Settlement Hierarchy and the identification of Norwich and the Urban Fringe as the location to accommodate 66% of the housing growth during the period to 2038 is strongly supported.

Norwich and the Urban Fringe is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing.

The Urban Fringe will play a significant role in providing sustainable growth, given their proximity to employment opportunities, services and strategic infrastructure, such as Broadland Northway. In addition, by virtue of its location, the fringe parishes are in close proximity of the countryside providing ease of access to the leisure and recreation opportunities it provides.

This approach is entirely consistent with paragraph 72 of the NPPF, which advises that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities."

Taverham represents an excellent location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway.

Taverham benefits from a variety of amenities including a public house, a supermarket, takeaways, petrol filling station and a garden centre. In addition, the area is within close proximity of the amenities provided within Thorpe Marriott and Drayton. Nightingale and Ghost Hill Infant schools are located in close proximity of the site, as are Taverham Junior and High Schools. A private school (Langley Preparatory School at Taverham Hall) is located nearby. These will be sustained and enhanced by the increased population proposed.

### Change suggested by respondent:

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**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24096

Object

**Policy 0125R, 0125R Policy****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

On behalf of Abel Homes, we strongly support the allocation of GNL0125R, land west of West Lane, Horsham St Faith for residential development. The site is entirely deliverable and capable of making a valuable contribution towards satisfying the Council's housing needs during the period to 2038.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, the detailed wording (specifically some of criteria attached to the policy) is not sound, as elements are neither effective or justified. Minor alterations to Policy GNL0125R are therefore sought, to ensure its soundness.

See attached document for full representation

**Change suggested by respondent:**

See attached document for representation including proposed wording changes to the policy

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full response - <https://oc2connect.gnlp.org.uk/a/499>



24097

Object

**Policy 0159R, 0159R Policy****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

On behalf of Abel Homes, we strongly support the allocation of GNL0159R for residential development. The site is entirely deliverable, and capable of making a valuable contribution towards satisfying the Councils' housing needs during the period to 2038.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, the detailed wording (specifically the identified quantum of the development that can be accommodated on the site) is not sound, as elements are neither effective or justified. Accordingly, minor alterations to Policy GNL0159R are sought to ensure its soundness.

See attached document for full representation.

**Change suggested by respondent:**

See attached document for full representation, including suggested changes to policy wording

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Response - <https://oc2connect.gnlp.org.uk/a/49v>

24191

Object

**Policy 0520, 0520 Policy****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

On behalf of Abel Homes, we strongly support the allocation of GNLP0520, land South of Norwich Road, Hingham. As demonstrated during the various Regulation 18 consultations, the site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

The continued suitability of the site is detailed below. In considering the suitability of the site regard has been given to the specific requirements of Policy GNLP0520, as well as additional technical work, and discussions with key stakeholders, including the Lead Local Flood Authority and NCC (Highways), that have taken place since the Regulation 18 (c) consultation

On this basis, the allocation of land to the south of Norwich Road is considered to be sound based on the test of soundness set out in paragraph 35 of the NPPF, subject to minor alterations to the wording of Policy GNLP0520.

See attachment for full details

**Change suggested by respondent:**

On this basis, it is recommended that the wording of Policy GNLP0520 is revised to state that the site will accommodate at least 80 new homes; an approach that would be consistent with other site allocations in the draft Greater Norwich Local Plan. The proposed amendment would ensure that the policy is positively prepared, justified, and, therefore, sound.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 20210322 Regulation 19 - Hingham FINAL.PDF - <https://oc2connect.gnlp.org.uk/a/4b8>

24192

Support

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Abel Homes [16516]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

As detailed in comments relating to Policy 1 – The Sustainable Growth Strategy, the proposed Settlement Hierarchy is fully supported. Key Service Centres, such as Hingham, are sustainable locations that provide a range of services, as well as access to employment opportunities and public transport links. Accordingly, it is wholly appropriate that Key Service Centres should be identified as locations to accommodate a reasonable amount of growth (7% of the total housing growth) during the period to 2038. It fully supports the GNLP's aspirations of focusing growth in locations with access to jobs and services, whilst supporting a vibrant rural economy.

As detailed at paragraph 377, 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, White Hart Pub, library, a doctor's surgery, alongside a range of employment uses. The suitability and sustainability of Hingham for growth has been demonstrated through 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).

On this basis, the proposed policy is considered to be sound.

**Change suggested by respondent:**

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**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** 20210322 Regulation 19 - Hingham FINAL.PDF - <https://oc2connect.gnlp.org.uk/a/4b8>

24251

Support

**Policy 2164, 2164 Policy****Respondent:** Alan Boswell [20058]**Agent:** Lanpro Services Ltd (Mr Philip Atkinson, Director) [12609]**Petition:** 2 petitioners**Summary:**

Further to the recent publication of the Regulation 19 version of the emerging Greater Norwich Local Plan, I can confirm that my client Alan Boswell as owner of the vacant development site west of Eastgate House on Thorpe Road in Norwich supports the emerging allocation for the site reference GNLP2164 entitled Land west of Eastgate House, Thorpe Road as currently worded. My client contends that a minimum of 20 no. dwelling units as outlined in the emerging Policy can easily be achieved on the site and as advised previously this site is immediately available and deliverable to meet future housing needs in the City. My client further considers that the emerging Policy as currently worded accords fully with all relevant Government guidance and importantly the tests of soundness contained in paragraph 35 of the National Planning Policy Framework.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23253

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** ACLE PARISH COUNCIL (Mrs SALLY ALDRIDGE, COUNCILLOR) [19791]**Summary:**

At no point during the process have I (and Acle Parish Council) been made aware of ANY consultation. Communication has been very poor. It seems that decisions have been made without involving the local residents or the body representing them.

**Change suggested by respondent:**

An official consultation period is needed. Little thought has been given to the number of houses proposed, the current infrastructure and what will be needed in the future.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

24248

Object

**Costessey, Settlement Map****Respondent:** Alfred Charles Homes Limited [20056]**Agent:** Brown & Co (Mr Paul Clarke, Associate Partner) [12840]**Petition:** 2 petitioners**Summary:**

It is considered that the draft Plan is unsound, as the strategy proposed is neither justified nor effective. The site at Farmland Road, Costessey, offers an appropriate opportunity to deliver growth in a manner that is appropriate to the sustainable objectives of the emerging Local Plan and NPPF. By undertaking a limited form of development on this site in a sustainable manner it would support the emerging Local Plan in paving the way for the region to become the UK leader in clean growth whilst raising the standards for design and placemaking.

The GNLP in its current form is not considered to be sound as the strategy fails to adequately deliver on the overall purpose of the plan, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft GNLP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, however it seeks to deliver growth through a traditional delivery model which perpetuates inappropriate development.

Additionally, the strategy is considered to be ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period, with some sites having been originally allocated in previous iterations of the Local Plan, dating as far back as 2004. Continuing to roll forward sites which have failed to deliver in line with the housing trajectory places the strategy for growth at risk and undermines the Plan led approach. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period, with a number of sites having no promoter or developer on board.

A limited form of development led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential development can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares. Provision of significant open space in the Tud river valley area, would create a significant area of green space, something which has become more important than ever in light of the pandemic. The relationship of the site with the existing services and facilities in the area will result in a sustainable form of development that will contribute significant benefits to the area

Please see attachment for full representation

**Change suggested by respondent:**

Please see attached representations

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Farmland, Costessey - <https://oc2connect.gnlp.org.uk/a/4gy>

23803

Support

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

Anglian Water supports the requirement to provide 10% biodiversity net gain for developments in the Greater Norwich area having followed the mitigation hierarchy.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23806

Object

**Water, 256****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

Para 256 – Policy 4 has been amended to take account of our previous comments relating to lobbying of utility companies. However the supporting text still refers to lobbying Anglian Water in respect of improvements to the wastewater network.

**Change suggested by respondent:**

To be effective it is suggested that the final sentence be removed from paragraph 256.

It is therefore suggested that paragraph 256 be amended as follows to ensure it is effective:

'Funding for water infrastructure improvements is provided through developer charges directly for connections to water supply network and foul sewerage networks. [Taking account of the above evidence, the policy therefore commits the Greater Norwich authorities to lobbying for the timely delivery of improvements to the waste -water network by AW.] [text to be removed]'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23809

Object

**Water, 257****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

Para 257 - Reference is also made to water infrastructure being capable of accommodating development or being able to be made so to ensure that there isn't a detrimental impact on water environment particularly in relation to water quality. However, the Habitats Regulations Assessment does not identify an adverse effect on the integrity of Natura 2000 sites assuming that capacity at water recycling centres is addressed. It is therefore suggested that the text should refer to water recycling centres and not water infrastructure more generally.

**Change suggested by respondent:**

It is therefore suggested that Paragraph 257 is amended to ensure it is justified and effective as follows:

'To ensure that development does not have a detrimental impact on the water environment, particularly in relation to water quality and the potential for impacts on the water-based sites protected under the Habitats Regulations Directive, major development will be dependent on the water [recycling] [new word] infrastructure being capable of accommodating the development or being able to be made so.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23802

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

Anglian Water is generally supportive of the requirements relating to water efficiency and flood risk management and protection of water quality but would ask that reference be made to water re-use measures, the use of SuDs as part of all development proposals together with receiving water recycling centres (which are used to treat sewage).

**Change suggested by respondent:**

It is therefore suggested that point 9 of Policy 2 be amended to be effective and justified as follows:

'Minimise flood risk, including Support [efficient] [text to be deleted] [integrated] [new word] water management. Flood risk should be minimised, including avoiding inappropriate development in areas at significant risk of flooding, reducing the causes and impacts of flooding, supporting a catchment approach to water management and using sustainable [drainage systems as part of all development proposals.] [new text] Development must also protect water quality, both surface and groundwater, and be water efficient [and make use of water-reuse measures wherever feasible.] [new text]

To achieve the latter:

It is therefore suggested that point iv of Policy 2 be amended to be effective as follows:

'Potential applicants for planning permission for major developments are advised to contact Anglian Water Services in the early stages of producing a development scheme in order to ensure that there is adequate capacity, or capacity can be made available, in the [wastewater] [word to be deleted] [sewerage] [new word] network [and at the receiving water recycling centre.] [new text]The provision of capacity could affect the timing of development. In locations where there are known to be capacity issues the local authority will expect this engagement to have taken place and for it to be demonstrated that adequate capacity will be available to serve the development (see Appendix 1 Infrastructure Requirements for currently known locations with capacity issues)'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** aw-ea-natural-england-water-efficiency-advice-note-final.pdf - <https://oc2connect.gnlp.org.uk/a/466>



23834

Support

**R31, R31 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

Anglian Water is the land owner of Site R31: Heigham Water Treatment Works, Waterworks Road which is allocated for housing in the adopted Norwich City Site Allocations Plan. We continue to support the allocation of this site for housing as it is both available and deliverable within the plan period of the new Local Plan.

Savills will be making a separate response in relation to the above site on behalf of Anglian Water.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23840

Object

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing foul and surface water sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23844

Object

**Policy 0596R, 0596R Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP0596R:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23847

Object

**Policy 2108, 2108 Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing water mains and surface water sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is existing water mains and a surface water sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains and surface water sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP2018:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23848

Object

**Policy 2136, 2136 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water main within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

POLICY GNLP0451

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy GNLP2136:

'the safeguarding of suitable access for the maintenance of water supply infrastructure

**Legally compliant:** No

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23849

Object

**Policy HAR4, HAR 4 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water main and foul sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing water main and foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy HAR 4:

'the safeguarding of suitable access for the maintenance of water supply and foul drainage infrastructure

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23850

Object

**Policy HAR5, HAR5 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing foul sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

POLICY GNLP0451

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy HAR 5:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23851

Object

**Policy HAR6, HAR6 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water main and foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing water main and foul and surface water sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy HAR 6:

'the safeguarding of suitable access for the maintenance of water supply, foul and surface water drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23852

Object

**Policy 0378R/2139R, 0378R/2139R Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water mains within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There are existing water mains in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP0378R/2139R:

'the safeguarding of suitable access for the maintenance of water supply infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None



23853

Object

**Policy ACL1, ACL1 Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing water main within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy ACL1:

'the safeguarding of suitable access for the maintenance of water supply infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23854

Object

**Policy BRU3, BRU3 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing foul sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy BRU3:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23856

Object

**Policy HET3, HET 3 Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing water main within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy HET 3:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23857

Object

**Policy HIN2, HIN2 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing surface water sewer and related discharge point within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing surface water sewer and related discharge point in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing sewer is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy HIN2:

'the safeguarding of suitable access for the maintenance of surface water drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23858

Object

**Policy LOD3, LOD3 Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There are existing foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is existing foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy LOD3:

'the safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23860

Object

**Policy BLO5, BLO5 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing foul sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy BLO5:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23861

Object

**Policy 0297, 0297 Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing rising main (pressurised sewer) within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing rising main (pressurised sewer) in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP0297:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23863

Object

**Existing allocations to be carried forward, FOU2 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing rising main (pressurised sewer) within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing rising main (pressurised sewer) in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing rising main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing asset may be required.'

Add new criterion to Contingency Site Policy FOU2:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



23872

Object

**Policy 0264, 0264 Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP0264:

'the safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23874

Object

**Policy HNF1, HNF1Policy**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing foul sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy HNF1:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23875

Object

**Policy 0188, 0188 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There are existing water mains within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There are existing water mains in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy GNLP0188:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23887

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

Policy 4 should be amended to be effective in relation to the terminology used and for consistency with the findings of the Habitats Regulation Assessment in respect of water quality and the integrity of Natura 2000 sites.

**Change suggested by respondent:**

It is therefore suggested that Policy 4 be amended as follows to ensure it is effective and justified:

"Water supply and sewerage network improvements [including the waste -water network,] [text to be deleted] at Whitlingham water recycling centre and, the Yare Valley sewer, 101 and elsewhere [to accommodate growth] [new text] and [where required] [new text] to protect water quality and designated habitats.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23896

Object

**Policy 0133C, Policy 0133C****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water mains within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There are existing water mains in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Policy GNLP0133C:

'the safeguarding of suitable access for the maintenance of water supply infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23901

Object

**Policy 0401, Policy 0401****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water mains within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There are existing water mains in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP401:

'the safeguarding of suitable access for the maintenance of water supply infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23903

Object

**Policy 0409AR and BR, Policy 0409BR****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing surface water within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing surface water sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP409BR:

'the safeguarding of suitable access for the maintenance of surface water drainage infrastructure.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23904

Object

**Policy 0409AR and BR, Policy 0409AR**

**Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]

**Summary:**

There is existing surface water sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is an existing surface water sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing surface water should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing asset may be required.'

Add new criterion to Site Policy GNLP409AR:

'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23905

Object

**Policy 0506, 0506 Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing water mains and foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

There is existing foul within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Add new paragraph to supporting text to read:

There is an existing foul sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy GNLP506

'the safeguarding of suitable access for the maintenance of water supply, foul and surface water drainage infrastructure.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



23907

Object

**CC4, CC4A Policy****Respondent:** Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]**Summary:**

There is existing surface water sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

**Change suggested by respondent:**

Add new paragraph to supporting text to read:

There is an existing surface water sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'

Add new criterion to Contingency Site Policy CC4a

'the safeguarding of suitable access for the maintenance of surface water drainage infrastructure.'

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23690

Object

**Aylsham, Settlement Map****Respondent:** Julie and David Ashworth [19933]**Petition:** 2 petitioners**Summary:**

We, as Aylsham residents, are concerned that the new proposals are neither legally compliant, nor sound.

Regulation 18 stated that Aylsham would have one site of 300 homes put forward for consultation. However, Regulation 19 states that there will be two sites - resulting in a total of 550 new homes in Aylsham instead of 300. This has never been consulted on, either with the Town Council or the residents of Aylsham, and it is for this reason that we believe that the proposals are not legally compliant.

We believe that the proposals are not sound, as Regulation 19 failed to consider the impact of two sites on the infrastructure needs of the town, including schools, health facilities, roads and utilities. These have already been stretched with the building of the Youngs Park and Bure Meadows estates. There will also be an increase in the carbon footprint of the town.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23310

Object

**Policy 0596R, 4.9****Respondent:** Mrs Lorna Ashworth [16609]**Summary:**

This comment is both unsound and fails to be legally compliant as there was no consultation with the Town Council on Reg.19, only on Reg.18 when there were plans for one site.

**Change suggested by respondent:**

The comment on consultation should be taken out of the document as it is not true on Reg.19. Therefore the second site for Aylsham should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23308

Object

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**Policy 0596R, 4.7****Respondent:** Mrs Lorna Ashworth [16609]**Summary:**

As the Burgh Road site was agreed through consultation in reg.18, this is the second site. Reg 19 states there will be two sites, which has never been consulted. Therefore, this means that this site has failed to be legally compliant. The second site should also be rejected on the impact on the carbon footprint.

**Change suggested by respondent:**

The second site should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23309

Object

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**Policy 0596R, 4.8****Respondent:** Mrs Lorna Ashworth [16609]**Summary:**

This site is not legally compliant on the grounds of lack of consultation on Aylsham having two sites.  
This site is not sound due to the lack of consultation on infrastructure in respect of education, health and social care and green infrastructure.

**Change suggested by respondent:**

The second site for Aylsham under Reg. 19 should be withdrawn as it is not sound nor legally compliant

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23311

Object

**Policy 0596R, 4.10****Respondent:** Mrs Lorna Ashworth [16609]**Summary:**

This has taken some ideas from "Shaping Aylsham's Future" but failed to put them in context, implying a lack of soundness. They also referred to one site being developed not two. A second site would provide significant issues for infrastructure that are not appropriate for the layout of a Medieval Town. There are also areas of lack of a sound approach in the wording that could lead to further development.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn. There are no improvements that the plan could make to ensure that a second site is of benefit to this area of Norfolk and Reg. 19 has significantly failed respond to the needs of the community.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23312

Object

**Policy 0596R, 0596R Policy****Respondent:** Mrs Lorna Ashworth [16609]**Summary:**

This land should not be used for residential development as there has been no consultation on a second site, therefore it is not legally compliant. This is also true of the impact on the carbon neutral aims of Central Government, which are challenged by a second site. It is also unsound due to the failure to meet the infrastructure needs of the Town. There has been no consultation on the care home, the road improvements are limited to the vicinity of the site and the community use of the land offered.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn from Reg. 19. The infrastructure needs of the Town need addressing before any further development. The two recent developments failed to be of benefit for the majority of people who live in the Town.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23340

Object

**Aylsham, 4.5****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]

**Summary:**

Aylsham Town Council have discussed the draft Greater Norwich Local Plan at meetings attended by several members of the public and have unanimously agreed to object to the plan in its current state. The reasons for this are listed below. Is the plan legally compliant?

To ensure legal compliance the following must be adhered to:

- The process of community involvement for the plan should be in general accordance with the LPA's Statement of Community Involvement [SCI]. In regard to Aylsham no virtual engagement methods have been used to "to engage with community and stakeholder bodies "in the town.
- 1.6 Paragraph 155 of the National Planning Policy Framework (2012), states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged . . .

In regard to Aylsham, the Town Council were not approached and there is no evidence that "a wide section of the community has been proactively engaged".

- Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate ] requires Broadland to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan.

The LPA will be expected to provide evidence of how they have complied with the duty.

In regard to Aylsham, Broadland has not engaged constructively or otherwise with Aylsham Town Council, nor with North Norfolk District Council in respect of the Badersfield development near Aylsham.

We ask that Broadland provide evidence of how they have complied with this duty.

From the above for Regulation 19 to be legally compliant there must be evidence of consultation. Below are the key points on this issue.

- Aylsham Town Council, the residents of the town and the District Councillors were consulted on Regulation 18 when there was one site put forward for Aylsham with 300 homes.
- There has been no consultation with Aylsham Town Council or the residents on the changes regarding the content of the sites section of Regulation 19. There are two sites in Regulation 19 with 550 homes, an increase of 83% on the homes consulted upon in Regulation 18.
- There was no consultation on Regulation 19 with Aylsham Town Council or residents in regard to the infrastructure as it was assumed by the GNLP board that Regulation 18 consultation was sufficient, despite the significant changes in the two plans.
- The GNLP suggested that the feedback for Reg 18 gave 'confidence to the deliverability of new residential development in Aylsham'. The only supportive responses came from the developers. Therefore, the understanding of the response is inadequate and therefore both not legally compliant and unsound.

Is Regulation 19 Sound?

Is Regulation 19 positively prepared?

- There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham.
- Previous documents produced by Broadland District Council, the GNLP and Anglian Water highlight the problems of water supply and sewage disposal in respect of Aylsham. The requirement of an upgrade by Anglian Water is made but this does not come with guarantees or timescales. This issue was highlighted as a severe problem with the recent developments and with the one site put forward in Reg 18 this was considered a major issue. By putting forward two sites it becomes almost inevitable that there will be problems that could be insurmountable.
- By putting forward two sites the quality and speed of broadband will be severely tested and there will be a strong chance that the Central Government Target will not be met.
- Reg 19 describes the uniqueness of the town highlighting its history and the importance of retaining this. This has been a severe problem with the recent developments of 550 new homes at Willow Park and Bure Meadows, to add a further 300 as in Reg 18 would strain this considerably. However, to increase the number of new homes by a further 83% on the

edge of the town indicates that Reg 19 could not have been positively prepared as the evidence points to significant damage to the uniqueness of the medieval town.

- Reg 19 states that it has considered the impact of Covid. However, there is a lack of analytical analysis to show how that will impact on Aylsham's way of life and economy post pandemic. In Reg 18, Aylsham was allocated one site. Then, in the middle of the Covid crisis, the town was allocated two sites without consultation, or consideration that more brownfield sites may become available when the crisis is over. This indicates that Reg 19 has not been positively prepared and opportunities to look beyond the large-scale developments on the edge of towns and cities have been lost.
- There is a similar lack of thought in Reg 19 concerning Brexit, which will have a significant impact on the greater Norwich area. To commit, without consultation, two sites for a small market town such as Aylsham, when the country will be in a significant period of economic flux demonstrates a lack of preparation and thought.

Is Regulation 19 Justified?

- As stated under legal compliance, the residents of the town were consulted on the need for ONE site. There were concerns with Reg 18, particularly in respect of the demands it would make on the infrastructure of the town. However, to have two sites as in Reg 19 magnifies these infrastructure issues. In Reg 18 there was no mention of Aylsham having two sites and there has been no consultation with the Town Council or the residents on the allocation of two sites in Reg 19. Therefore, Reg 19 has not met the test of being justified.
- Two sites brings an increase to the proposed level of development to 83% on the consultation figure – 550 homes increases the total number of homes by 15.6%. The population of the town is likely to increase by a similar figure. This increase contradicts point 188 in the Strategy section which states there should be "reasonable levels of growth in the main towns." This increase cannot be met by the current infrastructure in the town or by improvements offered by the plans within Reg 19.
- There is a lack of clarity and urgency in Reg 19 on the building of a primary school. A sound approach would be to state that, with all the primary schools in Aylsham full, the building of the school should take place as a priority.
- On the original Reg 18 consultation there was a policy for a school in Aylsham, but this is watered down in Policy GNL0311, 0595 and 2060 where it merely states "2 ha of land at nil value to be provided for a new primary school on site". There are no details as to when this will come forward. The school needs to come before the houses. There is no capacity in Aylsham schools currently and the full impact of the new housing at Bure Meadows and Willow Park is still to be felt. Also, we understand, this is not a new school, but a replacement of the existing school and there is no indication of the increase in size. There is a lack of urgency in this policy. Schools in neighbouring villages are also at capacity and Aylsham High School is also near capacity. In Reg 18 there was consultation on one site and the provision of a school. As there has been no consultation for two sites, the significant impact this will have on the provision of education in Aylsham and the surrounding area has not been addressed. Therefore, the decision to allocate two sites is not justified.
- There is limited nursery provision in Aylsham. This will be put under significant pressure by 300 homes let alone the extra 250 homes allocated.
- The road network through the town will not cope with the extra traffic generated by the new school and the increased population. The developers of this site and the GNL0311 have put in some mitigating factors in the immediate vicinity of the sites but ignored the fact that the road from the town to the site is already busy and in places needs to be single tracked and cannot be widened to accommodate additional traffic. These road problems will be magnified with the second site on Norwich Road and the proposed site at Badersfield. In addition, creation of nearly 900 new homes within a short distance of Aylsham town centre will create severe parking problems, which, pre-Covid, was already a major issue in Aylsham and once some normality is returned will continue to be. These issues highlight that the plans for Aylsham in Reg 19 are not sound as the document has failed to make a case that they are justified and will not significantly harm the town.
- The Town Council have been extremely disappointed with recent work undertaken by both Broadland District Council and Norfolk County Council on making improvements to the road network. Both authorities have looked at small sections rather than the whole town. Consultation so far has been inadequate at best and a meaningless cost exercise at worst. The Town Council have looked at this and come up with an initial plan and are continuing to refine this work. Reg 18 with one site would obviously create real problems for the road network; Reg 19 with two sites would make the problem significantly worse. The Plan does not justify in any way that it can cope with these problems.
- Reg 19 fails to justify how two sites with 550 homes would not have an adverse impact on the health and social care of the town. The consultation in Reg 18 concerning the issue of health and social care was in regard to 300 homes. Aylsham Care Trust (ACT) responded to an earlier consultation that they would like to see a day unit built to try and keep

people in their own home, which is in keeping with government policy. In addition, there are already urgent problems regarding medical care within the town, which Reg 19 fails to consider.

In putting forward a second site, Reg19 offers a 90-bed care unit/extra care housing. However, without consultation, the response to the needs of health and social care and infrastructure in general within Aylsham have not been met and there is a real problem of soundness and in reality, neglect.

- The points above highlight how the allocation of two sites contradicts the Strategy section point 132 which states that new communities “will be reasonable and sustainable communities” and “well integrated with our existing communities”. To increase the number of homes in Aylsham in a short space of time by more than 15% will mean this objective of the Strategy document cannot be met.
- In point 136 it states that “homes will have good access to services and facilities” and they “will enhance local character to meet the needs of all mixed communities”. The failure to meet the infrastructure needs of the town, while wanting to expand the number of new homes by 83% from Reg 18, does mean that Reg 19 is not justified in respect of the document’s own strategy.

Is Regulation 19 effective?

- There is no evidence in the document that there has been any consideration of what is happening in the area to the north, north east and north west of Aylsham, which is in North Norfolk Local Authority. Recent announcements regarding a development of 300+ houses at nearby Badersfield will have an impact on Aylsham, as the majority of children from Badersfield attend Aylsham High School. There would also be increased pressure on the town centre and other services. This development is almost akin to a third site in Aylsham. Therefore, Reg 19 fails to be sound on a basic issue, consulting with and working with the neighbouring authority (See Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate]).

Is Regulation 19 Consistent with National Policy

- An important strategy of the document and Central Government Policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by putting forward two sites for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target. One site, as was consulted upon in Reg 18, was a problem regarding working towards a climate neutral target, but to increase the number of new homes dependent on cars by 83% without consultation is negligent in respect of keeping to Central Government Policy and the Paris Accord.

Conclusion

- Reg 18 stated that Aylsham would have one site that was put forward for consultation. Reg 19 states there will be two sites, which has never been consulted. Therefore, this means that Reg 19 has failed to be legally compliant.
- Reg 19 has failed in soundness in considering the impact of two sites with 550 homes on the infrastructure of the town.
- Reg 19 has failed in soundness in its failure to keep to the strategy put forward in the first part of the Plan and central government policy.
- An important strategy of the document and central government policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by putting forward two sites for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target.

**Change suggested by respondent:**

- The inclusion of a second site put forward in Reg 19 should be withdrawn.
- The second site was included in Reg 19 to meet a target of 5000+ new homes beyond Reg 18. The 250 new homes allocated for the second site in Aylsham can be met by several different options:
  1. The approval of two further developments at Drayton and near Rackheath, that were not in Reg 19, increases the number of additional homes put forward by over 400;
  2. The GNLP could consider the allocation of a small number of homes in villages which need homes to maintain their viability;
  3. The impact of Covid and Brexit will almost certainly lead to an increase in the number of brownfield sites becoming available for development. This option is certain to provide space for at least 250 more homes. It is perhaps worth highlighting that the area that provided the largest percentage of new homes from Reg 18 to Reg 19 was the main towns – a decision that was taken without consultation.
- Even without a second site in Aylsham, there needs to be improvements in the infrastructure to deal with the demand of 300 new homes:
  1. The primary school should be in the first stage of development;
  2. Before any further development Aylsham should have improved health and care facilities with a viable medical centre, including a doctor's surgery, and a day care centre as put forward by ACT;
  3. There must be a viable road management system with increased parking to be able to meet the needs of an increased population;
  4. There must be significant improvements to the water supply and water management system before further development;
  5. There must be improved broadband access;
  6. There must be an upgrade to electrical sub-stations and provision of electrical charging points.
  7. There must be protection for the green infrastructure around the town.
- All these infrastructure issues apply to Reg 18 where one site was put forward. However, to move to two sites, without consultation, creates a problem that may be insurmountable without significant investment, way beyond the support given by the developers for two sites. The local authority and the county council must be prepared to change their policies in respect of investment or accept that the damage caused by 550 new homes in a market town based on a medieval town structure with a population with a high percentage of senior people, is not suitable for this scale of development.
- Therefore, the second site put forward in Reg 19 should be withdrawn.
- Any further development must be in keeping with the points laid out in the Aylsham Neighbourhood Plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None



23753

Object

**Aylsham, 353****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

It is stated that Anglian Water have 'plans' to increase capacity. Where are the guarantees? Where are the time scales?  
Any future development should not be approved until this work has been completed

**Change suggested by respondent:**

To insist on the work coming before the development

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

23728

Object

**What is the Local Plan?, 1****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Failure to consult with the Town Council and the neighbouring authority of North Norfolk

**Change suggested by respondent:**

You need to consult and then this question can be answered!

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

23729

Object

**Infrastructure, 143****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

There is a lack of clarity and urgency in Reg 19 on the building of a primary school. A sound approach would be to state that, with all the primary schools in Aylsham full, the building of the school should take place as a priority.

**Change suggested by respondent:**

The policy should state the school MUST come before the houses and Norfolk County Council must commit to this. IF both sites are agreed then the school must be built on the first site to come to development

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23730

Object

**Communities, 132****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Other points highlight how the allocation of two sites in Aylsham contradicts the Strategy section point 132 which states that new communities “will be reasonable and sustainable communities” and “well integrated with our existing communities”. To increase the number of homes in Aylsham in a short space of time by more than 15% will mean this objective of the Strategy document cannot be met.

**Change suggested by respondent:**

Detailed consultation is still required to see if or how these issues can be mitigated. The GNLP Failed to do this as they bypassed 18d

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23731

Object

**Homes, 136****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

In point 136 it states that “homes will have good access to services and facilities” and they “will enhance local character to meet the needs of all mixed communities”. The failure to meet the infrastructure needs of Aylsham, while wanting to expand the number of new homes by 83% from Reg 18, does mean that Reg 19 is not justified in respect of the document’s own strategy.

**Change suggested by respondent:**

Remove the requirement for two sites

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

23732

Object

**Infrastructure, 143****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Lack of understanding of the problems by the principle authorities and a tendency to pay lip service to consulting and continuing with their pre-agreed plans

**Change suggested by respondent:**

Revert to Reg 18

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

23733

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

- The policy does not meet carbon neutral ambitions

**Change suggested by respondent:**

- Reduce the number of houses to the Reg 18 level

Legally No  
compliant:

Sound: No

Comply with No  
duty:

**Appear exam:** Appearance at the examination

**Attachments:** None

23734

Object

**The Growth Strategy, 188****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

- Two sites in Aylsham brings an increase to the proposed level of development to 83% on the consultation figure – 550 homes increases the total number of homes by 15.6%. The population of the town is likely to increase by a similar figure. This increase contradicts point 188 in the Strategy section which states there should be “reasonable levels of growth in the main towns.” This increase cannot be met by the current infrastructure in the town or by improvements offered by the plans within Reg 19.

**Change suggested by respondent:**

- The plan should be withdrawn as the methodology for calculating new homes is flawed

Legally No  
compliant:

Sound: No

Comply with No  
duty:

**Appear exam:** Appearance at the examination

**Attachments:** None

23741

Object

**The Growth Strategy, 189****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

As stated under legal compliance, the residents of the town were consulted on the need for ONE site. There were concerns with Reg 18, particularly in respect of the demands it would make on the infrastructure of the town. However, to have two sites as in Reg 19 magnifies these infrastructure issues. In Reg 18 there was no mention of Aylsham having two sites and there has been no consultation with the Town Council or the residents on the allocation of two sites in Reg 19. Therefore, Reg 19 has not met the test of being justified.

**Change suggested by respondent:**

Withdraw the plan until proper consultation has taken place

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23742

Object

**What is the Local Plan?, 3****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

The process of community involvement should be in general accordance with the LPA's Statement of Community Involvement [SCI]. In regard to Aylsham no virtual engagement methods have been used "to engage with community and stakeholder bodies "in the town.

1.6 Paragraph 155 of the NPPF (2012), states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged . . .

In regard to Aylsham, the Town Council were not approached and there is no evidence that "a wide section of the community has been proactively engaged".

**Change suggested by respondent:**

Withdraw and consult

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23743

Object

**What is the Local Plan?, 4****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Aylsham Town Council, the residents of the town and the District Councillors were consulted on Regulation 18 when there was one site put forward for Aylsham with 300 homes.

There has been no consultation with Aylsham Town Council or the residents on the changes regarding the content of the sites section of Regulation 19. There are two sites in Regulation 19 with 550 homes, an increase of 83% on the homes consulted upon in Regulation 18.

This would seem to be to allow the plan to be fast tracked before the new regulations came into place

**Change suggested by respondent:**

The speed in wish this has been put through at the later stages is solely based on the government white paper - a paper that is widely disputed by its own MPs. Whilst understanding the reluctance to start again the undue haste and lack of 18d consultations does not make sense either. Go back a stage and look at real consultation on changes made

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23744

Object

**Setting the scene - a vibrant place to live and work, 8****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Lack of consideration to the effects of both covid and Brexit on the local economy and population

**Change suggested by respondent:**

Undertake or commission better analysis on the effects of both covid and brexit and adapt the plan to the findings rather than enthusiastic but possibly misplaced optimism.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23750

Object

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**Aylsham, 350****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Reg 19 describes the uniqueness of the town highlighting its history and the importance of retaining this. This has been a severe problem with the recent developments of 550 new homes at Willow Park and Bure Meadows, to add a further 300 as in Reg 18 would strain this considerably. However, to increase the number of new homes by a further 83% on the edge of the town indicates that Reg 19 could not have been positively prepared as the evidence points to significant damage to the uniqueness of the medieval town.

**Change suggested by respondent:**

Withdraw the plan to allow full consultation

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23751

Object

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**Aylsham, 352****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

The primary schools in Aylsham are full and there is a lack of urgency regarding building a school. This is not a third school but a replacement school so the increase in pupil numbers will not be vast. This policy requires strengthening to ensure Norfolk County Council act before the developers

**Change suggested by respondent:**

Consultation at Reg 18 was on one development that should be the plan for Reg 19

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23756

Object

**Aylsham, 4.2****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham. If simple information such as this is incorrect how can the rest of the plan be trusted?

**Change suggested by respondent:**

Withdraw the plan until consultation has been made

Legally No  
compliant:

Sound: No

Comply with No  
duty:

**Appear exam:** Appearance at the examination

**Attachments:** None

23758

Object

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

The road network cannot cope with these additional houses especially with the poor school site chose

**Change suggested by respondent:**

Withdraw Reg 19 and consult fully

Legally No  
compliant:

Sound: No

Comply with No  
duty:

**Appear exam:** Appearance at the examination

**Attachments:** None



23760

Object

**Policy 0596R, 0596R Policy****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Allocation of two sites was not in the consultation at Reg 18.

There is also no justification for the 90 bed unit given and is in direct contradiction with the views of Aylsham Care Trust (ACT) who have long experience in this field

**Change suggested by respondent:**

Withdraw Reg 19 and consult

Legally No  
compliant:

Sound: No

Comply with No  
duty:

**Appear exam:** Appearance at the examination**Attachments:** None

23761

Object

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Aylsham Town Council (Ms Sue Lake, Clerk) [13265]**Summary:**

Poor road network from the site to the town and terrible placement of primary school

**Change suggested by respondent:**

Withdraw Reg 19

Legally No  
compliant:

Sound: No

Comply with No  
duty:

**Appear exam:** Appearance at the examination**Attachments:** None

24378

Support

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Mr Richard Bacon [17000]**Summary:**

Policy 7.6 - New Settlements

I would like to place on record my support for the proposed new settlement site at Hethel, known as the Stanfield Garden Village, ahead of the investigation into new settlement sites later this year. This settlement would provide a self-sufficient, low-carbon community in a vibrant location. Moreover, the speed of delivery and the availability of both affordable and self/custom-build homes at scale would help to address local and national housing needs at pace, providing an innovative and sustainable solution to the current housing crisis. A new settlement at Hethel would also carry benefits with respect to meeting South Norfolk District Council's statutory duty to fulfil self-build demand.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 - Richard Bacon MP.pdf - <https://oc2connect.gnlp.org.uk/a/4wp>

24379

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Mr Richard Bacon [17000]**Summary:**

Policies 7.4 and 7.5 - Self-Build Provision

The GNLP refers to self/custom-build in Policy 7.4:

"Affordable housing led development, which may include an element of market housing (including self/custom build) if necessary, for viability, up to a maximum of 15 dwellings in total . These sites should be adjacent or well related to settlement boundaries with good access to' services, including safe routes to schools, subject to other policies of the local plan.11

and Policy 7.5:

"Policy 7.5 promotes small scale housing development, including self/custom build. This complements policies 5 and 7.4 which also support self /custom build .11

There were 113 people on the self/custom-build housing registers in 2018/19 alone, highlighting the demand for self/custom-build. I do not believe the GNLP's policies reflect this level of demand and I would like to see provision for self/custom-build strengthened in the GNLP.

**Change suggested by respondent:**

Policies 7.4 and 7.5 - Self-Build Provision

The GNLP refers to self/custom-build in Policy 7.4:

"Affordable housing led development, which may include an element of market housing (including self/custom build) if necessary, for viability, up to a maximum of 15 dwellings in total . These sites should be adjacent or well related to settlement boundaries with good access to' services, including safe routes to schools, subject to other policies of the local plan.11

and Policy 7.5:

"Policy 7.5 promotes small scale housing development, including self/custom build. This complements policies 5 and 7.4 which also support self /custom build .11

There were 113 people on the self/custom-build housing registers in 2018/19 alone, highlighting the demand for self/custom-build. I do not believe the GNLP's policies reflect this level of demand and I would like to see provision for self/custom-build strengthened in the GNLP.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 - Richard Bacon MP.pdf - <https://oc2connect.gnlp.org.uk/a/4wp>

24380

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Mr Richard Bacon [17000]

### Summary:

Policies 7.4 and 7.5 - Self-Build Provision

The GNLP refers to self/custom-build in Policy 7.4:

"Affordable housing led development, which may include an element of market housing (including self/custom build) if necessary, for viability, up to a maximum of 15 dwellings in total . These sites should be adjacent or well related to settlement boundaries with good access to' services, including safe routes to schools, subject to other policies of the local plan.11

and Policy 7.5:

"Policy 7.5 promotes small scale housing development, including self/custom build. This complements policies 5 and 7.4 which also support self /custom build .11

There were 113 people on the self/custom-build housing registers in 2018/19 alone, highlighting the demand for self/custom-build. I do not believe the GNLP's policies reflect this level of demand and I would like to see provision for self/custom-build strengthened in the GNLP.

### Change suggested by respondent:

Policies 7.4 and 7.5 - Self-Build Provision

The GNLP refers to self/custom-build in Policy 7.4:

"Affordable housing led development, which may include an element of market housing (including self/custom build) if necessary, for viability, up to a maximum of 15 dwellings in total . These sites should be adjacent or well related to settlement boundaries with good access to' services, including safe routes to schools, subject to other policies of the local plan.11

and Policy 7.5:

"Policy 7.5 promotes small scale housing development, including self/custom build. This complements policies 5 and 7.4 which also support self /custom build .11

There were 113 people on the self/custom-build housing registers in 2018/19 alone, highlighting the demand for self/custom-build. I do not believe the GNLP's policies reflect this level of demand and I would like to see provision for self/custom-build strengthened in the GNLP.

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 - Richard Bacon MP.pdf - <https://oc2connect.gnlp.org.uk/a/4wp>

24381

Object

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**Poringland, Settlement Map****Respondent:** Mr Richard Bacon [17000]**Summary:**

Primary School Provision in Poringland

While the current Plan seeks to address local education needs in Norfolk, it does little to address the needs of parents and children living in Poringland. Local children in Poringland are currently being taken to Trowse, approximately five miles away, via a bus. This is both costly and unnecessary seeing as Norfolk County Council has both a need and a funding allocation for a primary school in Poringland. I would very much like to see this addressed by the Plan

**Change suggested by respondent:**

Primary School Provision in Poringland

While the current Plan seeks to address local education needs in Norfolk, it does little to address the needs of parents and children living in Poringland. Local children in Poringland are currently being taken to Trowse, approximately five miles away, via a bus. This is both costly and unnecessary seeing as Norfolk County Council has both a need and a funding allocation for a primary school in Poringland. I would very much like to see this addressed by the Plan

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 - Richard Bacon MP.pdf - <https://oc2connect.gnlp.org.uk/a/4wp>

24382

Object

**Policy 5 Homes, 275****Respondent:** Mr Richard Bacon [17000]**Summary:**

SME Developers and Care Home Providers

There appears to be a shortfall of sites under 50 units for SME developers in the GNLP, both currently and in the next Local Plan period. This is unsustainable for small local developers and will result in the loss of valuable skills and housing choice in Norfolk. I believe that the number of sites suitable for SME developers should be significantly increased.

Care home providers in Norfolk also appear to have been neglected by the GNLP through the allocation process and I would like to see this addressed too.

**Change suggested by respondent:**

SME Developers and Care Home Providers

There appears to be a shortfall of sites under 50 units for SME developers in the GNLP, both currently and in the next Local Plan period. This is unsustainable for small local developers and will result in the loss of valuable skills and housing choice in Norfolk. I believe that the number of sites suitable for SME developers should be significantly increased.

Care home providers in Norfolk also appear to have been neglected by the GNLP through the allocation process and I would like to see this addressed too.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 - Richard Bacon MP.pdf - <https://oc2connect.gnlp.org.uk/a/4wp>

23241

Support

**Policy 1001, 1001 Policy****Respondent:** Badger Building (Mr Edward Gilder, Land and Planning Manager) [17660]**Summary:**

NIL

**Change suggested by respondent:**

NIL

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23422

Object

**Policy 0596R, 0596R Policy****Respondent:** Ms Wendy Bainham [19855]**Summary:**

The site is illegal due to lack of consultation for two sites in Aylsham. Aylsham has insufficient doctors surgeries, social care, green spaces and leisure facilities.

**Change suggested by respondent:**

The transportation idea for Aylsham is a good one but further housing and people are not conducive to a settled community. Aylsham is already overcrowded with the many housing projects completed within the last ten years.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23227

Object

**Policy 0380, 0380 Policy****Respondent:** Miss Lindsay Balls [18887]**Summary:**

Strongly Strongly object! Loss of habit and ancient trees protected by law, dangerous site entrance on a small country road will cause more accidents. A field that already floods and had no connection to utilities. Dangerous place to build for families who need to cross the road to access the village school, shop etc.

**Change suggested by respondent:**

I am very concerned that building on GNLP0380 is dangerous, my reasons listed above. I also cannot believe that at a time when we should be trying to save the planet the council would cut down established & protected oak trees! Surely it would be more practical and financially sound to find a site that already has most of the attributes needed to easily and more cheaply build houses? This site is nothing but a field- it will cost the council more to have to build new sewage pipes, a new site entrance, and potentially new traffic calming measures then to build on a road such as Station Road which is already wider and has pathways already built and no blind bends! I would counter propose that the new housing on the old school site is included in the village quota and that if other housing is needed it should all be built at GNLP4016. If this cannot be done then all housing to be built at GNLP4016 as it is safer, more practical and will save the council much needed money.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23416

Support

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**Policy 4016, 4016 Policy****Respondent:** Miss Lindsay Balls [18887]**Summary:**

This road already has the infrastructure to cope with new houses. No blind bends to the road and pavements already in place. A much safer place to build new houses and closer to the school and village hall.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



24137

Object

**Aylsham, Settlement Map****Respondent:** Miss Hannah Barker [19786]**Petition:** 2 petitioners**Summary:**

My partner and I feel very strongly that this has not been appropriately consulted on and therefore the process is not legal or sound.

The new plan is substantially different from the plan consulted on previously and allowing this to go through now would make a mockery of the whole process.

Since consultation, 250 more houses have been added to the plan and there has therefore been no consideration of the views and concerns from the local residents and the town council who know the area.

We have already been subject to a huge amount of development with current sites still being built on and this additional 250 homes, on a different site is a step too far. Should this have been in the initial plan, I am certain more people would have objected.

We do not have the infrastructure in Aylsham to support this huge and rapid growth any therefore I do not consider the decision is sound. I have lived here for years and am still registered at a dentist out of area.

The environmental effects and change to the rural area cannot be underestimated and any changes must go through the correct democratic process before we loose something we can't replace.

**Change suggested by respondent:**

The plan should not proceed without a full and transparent process - ie full consultation.

This is the only way that the views of the local residents and local council can be heard and taken into consideration.

Before any additional sites are considered, infrastructure must be dramatically improved and the effects on the carbon footprint and change to the rural area must be fully considered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23624

Support

**Infrastructure, 141****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

This all sounds good - but I have seen little or no evidence so far of "safe, attractive and well-designed routes for pedestrians and cyclists". Indeed, developments in the Norwich area have often reduced safe routes for cyclists and pedestrians. Needs to be backed up with action.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23633

Object

**Introduction, 163****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

By including the Norwich Western Link, the plan ignores evidence that building this road will cause major damage to the Wensum valley and its wildlife. It is therefore not "based on an extensive evidence base".

**Change suggested by respondent:**

Remove support for the Norwich Western Link.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23634

Object

**The Natural Environment, 210****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

I support the wording but it clearly isn't true because of the plan's support for the Norwich Western Link road. Building this road will not protect or enhance Greater Norwich's rich natural environment - quite the opposite.

**Change suggested by respondent:**

Drop support for Norwich Western Link in other parts of the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23637

Object

**Policy 5 Homes, 271****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

More housing needs to be affordable. Too many large, luxury houses are being built. These attract people from areas with high house prices (such as London) but are beyond the budget of locals, especially younger people hoping to own their first home.

**Change suggested by respondent:**

Increase allocations of affordable housing.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23617

Object

**The Cycle Network, 88****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

It is not true to say that there is a good network of cycle routes in Greater Norwich. (I have given several examples.)

**Change suggested by respondent:**

The plan needs to reflect the true situation - cycle routes are often poor and new developments have not made them any better (and sometimes worse).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23621

Object

**Infrastructure, 138****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

The Western Link road will cause significant environmental damage to the Wensum Valley its wildlife. New roads generate more traffic - support for this road directly contradicts 141 below "there will be a radical shift away from the use of the private car" and 140 "emissions from transport ... will be significantly reduced".

**Change suggested by respondent:**

The Norwich Western Link road should be removed from the plan. It is incompatible with the plan's environmental proposals.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23630

Object

**Environment, 148****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

Although brownfield sites often are a better place to build than greenfield sites, this is not always true. Brownfield sites can sometimes support much higher levels of biodiversity than greenfield sites, and in these instances they must be protected.

National examples of superb brownfield sites include Swanscombe Marshes in Kent

<https://www.buglife.org.uk/campaigns/save-swanscombe-marshes/>). A heavily sprayed, hedgeless farmer's field is a greenfield site but supports very little wildlife.

**Change suggested by respondent:**

The plan needs to be more nuanced. It is not enough to say "brownfield good for building. greenfield bad".

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23631

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

Building the Norwich Western Link road is not compatible with the plan's aims to address climate change. As well as damaging the Wensum Valley it will lead to increased usage of the private car and a consequent increase in carbon emissions.

**Change suggested by respondent:**

Drop support fro Norwich Western Link, as it is incompatible with other parts of the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23635

Object

**Transport, 240****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

Building a Norwich Western Link road is completely incompatible with the plan's other stated aims of addressing climate change and protecting the natural environment. The road is also a colossal waste of money (as was the NDR) which will divert funds from essential services that currently enhance the wellbeing and livelihoods of Norfolk residents.

**Change suggested by respondent:**

Remove support for Norwich Western Link road.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23636

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

Building a Norwich Western Link road is incompatible with other aims in the plan, such as addressing climate change and protecting the natural environment. It will increase car usage and take funds away from alternatives such as public transport and provision of facilities for cyclists and pedestrians.

**Change suggested by respondent:**

Remove support for Norwich Western Link road.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23638

Object

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**Aylsham, 351****Respondent:** Mr Jeremy Barlett [19588]**Summary:**

It is unclear how "development could support further improvements" to the Bure Valley and the Marriott's Way, given that these are of fixed width and route.

Any increase in population in areas next to these routes is likely to increase their usage. Marriott's Way is already busy and an increase in users will just add to the congestion.

It is good to see families out cycling on these routes but this is not compatible with cycling at a reasonable speed.

**Change suggested by respondent:**

This section should be clarified or removed, as the current wording is unhelpful.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24286

Object

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**Housing, 60****Respondent:** Barnham Broom Golf and Country Club [16978]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]

**Summary:**

It is acknowledged that the scale and spatial distribution of housing across Greater Norwich needs to be determined by consideration of need, constraint and capacity. However, what a preferred approach must also do - fundamentally – is seek to address where and how people might choose to live (in essence, to provide a supply where there is demand) within the area, as we contemplate the future needs of and impact upon communities. We understand a Greater Norwich-wide needs assessment seeks to address demand within it, if housing delivery (in meeting all identified needs) is to be successful.

We also acknowledge that constraints in an area mean that a hierarchical/settlement-based approach should not be cast aside in favour of unconstrained development in places where most people would like to live. However, housing choice – in locational and housing type terms – should not be overlooked. For a development to be sustainable, apart from anything else, it is essential that residents choose where to move to, that their daily needs are conveniently accessible, and local services can accommodate and benefit from the expanded community created.

The published Central Norfolk SHMA, part 2 (chapter 8 of which addresses Housing for Older People) highlights that there is a structural inadequacy in suitable housing for the 'retirement+' market, with demand in 20 years expected to be as much as 5x the current provision. With purpose-designed and serviced housing it has been proven that independent living (providing higher levels of mental health and personal wellbeing) can be extended and supplemented by assisted living, so that nursing and elderly care requirements are contained to end of life. Revised Government policy/Guidance places an increased emphasis on this.

Paragraph 60 refers to the need for the Plan to “support the delivery of housing suitable for older people and support active retirement.” Barnham Broom Golf & Country Club’s proposals for a retirement village associated with the established and growing 'hub' of facilities - to create a diverse and sustainable community - would address and meet such requirements.

(Please refer to previous - attached - submission for further details)

In failing to address this, we contend that the Plan is unsound.

**Change suggested by respondent:**

Acknowledgement in the Plan of the need for a more diverse, flexible and innovative approach to providing specialist 'retirement' housing is necessary to make the Plan sound, together with a specific identification/allocation of the site for specialist housing, in Part 2 of the Plan.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 09.03.20 Letter and Masterplan.pdf - <https://oc2connect.gnlp.org.uk/a/4cm>

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**24287**
**Object**
**Policy 5 Homes, 275**

**Respondent:** Barnham Broom Golf and Country Club [16978]

**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]



**Summary:**

It is acknowledged that the scale and spatial distribution of housing across Greater Norwich needs to be determined by consideration of need, constraint and capacity. However, what a preferred approach must also do - fundamentally – is seek to address where and how people might choose to live (in essence, to provide a supply where there is demand) within the area, as we contemplate the future needs of and impact upon communities. We understand a Greater Norwich-wide needs assessment seeks to address demand within it, if housing delivery (in meeting all identified needs) is to be successful.

We also acknowledge that constraints in an area mean that a hierarchical/settlement-based approach should not be cast aside in favour of unconstrained development in places where most people would like to live. However, housing choice – in locational and housing type terms – should not be overlooked. For a development to be sustainable, apart from anything else, it is essential that residents choose where to move to, that their daily needs are conveniently accessible, and local services can accommodate and benefit from the expanded community created.

The published Central Norfolk SHMA, part 2 (chapter 8 of which addresses Housing for Older People) highlights that there is a structural inadequacy in suitable housing for the 'retirement+' market, with demand in 20 years expected to be as much as 5x the current provision. With purpose-designed and serviced housing it has been proven that independent living (providing higher levels of mental health and personal wellbeing) can be extended and supplemented by assisted living, so that nursing and elderly care requirements are contained to end of life. Revised Government policy/Guidance places an increased emphasis on this.

Paragraph 275 notes: "An increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist Norfolk County Council's aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing". Barnham Broom Golf & Country Club's proposals for a retirement village associated with the established and growing 'hub' of facilities - to create a diverse and sustainable community - would address and meet such requirements.

(Please refer to previous - attached - submission for further details)

In failing to address this, we contend that the Plan is unsound.

**Change suggested by respondent:**

Acknowledgement in the Plan of the need for a more diverse, flexible and innovative approach to providing specialist 'retirement' housing is necessary to make the Plan sound, together with a specific identification/allocation of the site for specialist housing, in Part 2 of the Plan.

**Legally compliant:** No

**Sound:** Yes

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** 09.03.20 Letter and Masterplan.pdf - <https://oc2connect.gnlp.org.uk/a/4cm>

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**24288**
**Object**
**Policy 5 Homes, Policy 5 Homes**

**Respondent:** Barnham Broom Golf and Country Club [16978]

**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]

**Summary:**

It is acknowledged that the scale and spatial distribution of housing across Greater Norwich needs to be determined by consideration of need, constraint and capacity. However, what a preferred approach must also do - fundamentally – is seek to address where and how people might choose to live (in essence, to provide a supply where there is demand) within the area, as we contemplate the future needs of and impact upon communities. We understand a Greater Norwich-wide needs assessment seeks to address demand within it, if housing delivery (in meeting all identified needs) is to be successful.

We also acknowledge that constraints in an area mean that a hierarchical/settlement-based approach should not be cast aside in favour of unconstrained development in places where most people would like to live. However, housing choice – in locational and housing type terms – should not be overlooked. For a development to be sustainable, apart from anything else, it is essential that residents choose where to move to, that their daily needs are conveniently accessible, and local services can accommodate and benefit from the expanded community created.

The published Central Norfolk SHMA, part 2 (chapter 8 of which addresses Housing for Older People) highlights that there is a structural inadequacy in suitable housing for the 'retirement+' market, with demand in 20 years expected to be as much as 5x the current provision. With purpose-designed and serviced housing it has been proven that independent living (providing higher levels of mental health and personal wellbeing) can be extended and supplemented by assisted living, so that nursing and elderly care requirements are contained to end of life. Revised Government policy/Guidance places an increased emphasis on this.

The policy and its preamble (Paragraph 275) notes: "An increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist Norfolk County Council's aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing". Barnham Broom Golf & Country Club's proposals for a retirement village associated with the established and growing 'hub' of facilities - to create a diverse and sustainable community - would address and meet such requirements.

(Please refer to previous - attached - submission for further details)

In failing to address this, we contend that the Plan is unsound.

**Change suggested by respondent:**

Acknowledgement in the Plan of the need for a more diverse, flexible and innovative approach to providing specialist 'retirement' housing is necessary to make the Plan sound, together with a specific identification/allocation of the site for specialist housing, in Part 2 of the Plan.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 09.03.20 Letter and Masterplan.pdf - <https://oc2connect.gnlp.org.uk/a/4cm>

24177

Support

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]**Petition:** 2 petitioners**Summary:**

Policy 1 introduces flexibility to accommodate additional growth if the housing needs of the Local Plan area change. It is therefore essential that this flexibility extends to other policies of the Local Plan, specifically those that allocate sites for development. This will ensure that any changes to the growth predictions in the Local Plan can be accommodated by increasing development yields at sites that have already been identified as sustainable without the need to rely on sites in potentially less sustainable locations. It will also mean that the plan is positively prepared and accords with the requirement of the NPPF to boost the supply of new homes by making the most efficient use of land in the most sustainable locations.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** P18-0134 GNLP Reg 19 reps final.pdf - <https://oc2connect.gnlp.org.uk/a/4bs>

24178

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]**Petition:** 2 petitioners**Summary:**

Policy 2 (Sustainable Communities) - Not justified; not consistent with national policy

1.7 Policy 2 requires development to "make provision for delivery of new and changing technologies". These include electric vehicle charging technologies. However, Policy 2 does not state the level of provision of charging points that will be required or identify the scale of development where this policy would be applicable. Instead, supplementary guidance is proposed to set out the details of future requirements.

1.8 A supplementary document cannot go beyond the requirements of planning policy. Therefore, as Policy 2 does not set a specific requirement for electric vehicle charging infrastructure it is not appropriate for a supplementary planning document to do so. Whilst other technologies are easier to install on sites the provision of electric vehicle charging infrastructure and the associated energy needs can have a direct impact upon the viability of development. Accordingly, any specific requirement for charging points that is proposed needs to have been assessed through the Viability Appraisal that accompanies the Local Plan. In this case, as Policy 2 does not require a specific percentage or number of charging points no such assessment has been carried out. Therefore, the impact on the viability of any future requirement has not been adequately assessed.

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1.9 This issue is particularly relevant to our client's site at Cringleford. The need to increase the capacity of the energy supply network through a reinforcement of the primary substation at Cringleford is a factor that could constrain the delivery of new homes.

1.10 It is essential that all associated costs related to electric charging infrastructure are taken into account to ensure that their cumulative impacts do not render sites undeliverable. This point was raised in responses to the Interim Viability Appraisal and this matter has not been adequately addressed in the final Viability Appraisal. 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. Without any assessment of the impact of requiring electric vehicle charging points on viability, and therefore the deliverability of sites, Policy 2 is not justified and should be amended. In addition, all reference to a future standard being provided by a supplementary planning document should also be deleted.

1.11 Following criterion 9 of Policy 2 it states "If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich". It is not clear whether this statement relates to criterion 9, criterion 10 or all the criteria of Policy 2. Therefore, this text does not accord with paragraph 16 of the NPPF, which requires policies to be clearly written and unambiguous. Notwithstanding this, the statement is not justified and, as there is, any such standards that may subsequently be introduced have not been assessed through the Viability Appraisal. Therefore, their potential impact upon the viability and deliverability of sites is unknown.

1.12 It is not reasonable for Policy 2 to allow the decision maker to choose which standards can be applied if higher standards have not been adequately assessed through the Local Plan process. New standards should be introduced through a partial review of the Local Plan so that the implications can be properly tested and understood. New standards should not be introduced through supplementary planning documents or implementation notes as the supporting text of Policy 2 indicates. These documents cannot legally introduce standards over and above policies of the Local Plan.

1.13 At the time of the Regulation 18 consultation the emerging Local Plan sought a 20% reduction against Part L of the 2013 Building Regulations (amended 2016).

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The interim viability appraisal that was consulted upon at that stage that a higher percentage would not be viable. Policy 2 now proposes a reduction to 19% "except where a lower provision is justified because the requirement would make the development unviable." Given the fact that the Council's own evidence indicates that 20% is unviable, it is reasonable to assume that the minor reduction to 19% will be unlikely to tip the balance in favour of viability. As the Viability Appraisal dated December 2020 does not clarify why the reduction from 20% to 19% is necessary it is difficult to understand how schemes will be more viable at this level.

1.14 The evidence base is similarly silent on the impact of the self-build requirement in this policy. The combination of these untested elements of the policy raises concerns about the implications of these requirements on deliverability.

1.15 Criterion ii encourages masterplanning using a recognised community engagement process on larger sites and particularly for proposed developments of 200 dwellings. There is no description of what this masterplanning process may constitute and therefore the use of such a process has the potential to delay delivery. There is no evidence that such delays have been acknowledged in the trajectory for homes that will be delivered on larger sites.

**Change suggested by respondent:**

1.16 It is recommended that criterion 2 of Policy 2 be amended to remove reference to a requirement for the provision of electric vehicle charging infrastructure until an assessment of the impact on the viability of developments of any such requirement has been carried out.

1.17 Policy 2 should also be amended to delete the wording: "If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich".

1.18 Further evidence is required to demonstrate that the 19% reduction against Part L of the 2013 Building Regulations (amended 2016) is justified. This evidence is needed to demonstrate that it will not result in sites being undeliverable when taking into account those requirements of Policies 2 and 5 that will further impact upon viability and have not been adequately assessed in the Viability Appraisal.

1.19 Further clarification should be provided as to the masterplanning process that developers are expected to undertake for larger sites. In addition to this, an

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assessment should be carried out as to whether this process would delivery of sites above the 200 dwellings threshold.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** P18-0134 GNLP Reg 19 reps final.pdf - <https://oc2connect.gnlp.org.uk/a/4bs>

## 24179

## Object

### Policy 5 Homes, Policy 5 Homes

**Respondent:** Barratt David Wilson Homes [15660]

**Agent:** Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]

**Petition:** 2 petitioners

**Summary:**

Policy 5 (Homes) - Not justified or consistent with national policy Affordable housing

1.20 The wording of Policy 5 identifies that in some circumstances the percentage of affordable housing that a site can deliver is dependent on financial viability. However, it only allows this important material consideration to be applied to brownfield sites.

1.21 Whilst it is less common for greenfield sites to have abnormal development costs there can be costs associated with infrastructure delivery and made-up land that impact upon the viability of schemes. This is especially the case for sites that are built out to lower densities where there is less flexibility to offset higher development costs against the number of new homes that are delivered. The requirements for self-build plots, space standards and part M(2) dwellings also have the potential to further reduce the level of affordable housing sites can viably deliver. As the requirement for self-build plots in particular has not been included in the Viability Appraisal there is no evidence that it will not render sites unviable to develop if there is no flexibility to the percentage of affordable housing.

1.22 Policy 5 needs to allow the applicant for any site to demonstrate that site specific matters can justify the need for a viability assessment to determine the level of affordable housing that should be delivered. This should not just be limited to brownfield sites. Without this flexibility Policy 5 has the potential to prevent sites coming forward, contrary to the requirements of paragraph 59 of the NPPF to boost housing supply. It is therefore not consistent with national policy.

1.23 The 2017 SHMA provides the evidence base for the percentage of affordable housing across the Greater Norwich area, which at that time was calculated as 28% across the Local Plan area. However, once the numbers that have already been delivered (detailed in the Greater Norwich Authority Monitoring Report) and those that could potentially be delivered by Policy 5 have been taken into account, there are questions about whether supply would exceed demand. Notwithstanding the fact that the Norwich area will only be required to deliver 28%, with the ability for this to be reduced due to viability issues, the minimum requirement of 'at least' 33% across the rest of the Local Plan area has the

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potential to far exceed demand based on the number of major developments that are allocated.

1.24 It is essential that the affordable housing requirements of Policy 5 required are appropriately evidenced to ensure that they are proportionate to future need. A policy that seeks to deliver more than is required must also be fully tested in terms of its impact on the viability of allocated sites. A requirement to deliver more than is required will inevitably impact on the viability of development sites to deliver other benefits and policy requirements that have not been assessed in the Viability Appraisal.

1.25 If as a result of this further work it is demonstrated that Policy 5 would overdeliver on affordable housing then this raises further concerns about the appropriateness of the Councils' strategy of not allowing a more flexible approach to the requirements of Policy 5 for non-brownfield sites. Without being able to take into account other material planning considerations when assessing the level of affordable housing that individual sites can deliver Policy 5 could prejudice the deliverability of individual sites, thereby undermining the effectiveness of the Plan. If following a further review of the evidence it is confirmed that Policy 5 will overdeliver affordable housing, then the requirements of Policy 5 for the provision of affordable housing on sites outside the Norwich area should be reduced accordingly.

**Change suggested by respondent:**

1.26 The percentage of affordable housing required by Policy 5 should be reviewed in light of past provision since the SHMA was produced and the numbers that could potentially be delivered by sites of more than ten units in the Local Plan area. If as a result of this further work the identified need for affordable housing is shown to be exceeded by the requirements of Policy 5 then the percentage of affordable housing for sites outside the Norwich City Centre area should be reduced accordingly.

1.27 Notwithstanding the above, the wording of Policy 5 should also be amended so that viability considerations can be taken into account for all sites and not just brownfield sites.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** P18-0134 GNLP Reg 19 reps final.pdf - <https://oc2connect.gnlp.org.uk/a/4bs>

## 24180

## Object

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Barratt David Wilson Homes [15660]

**Agent:** Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]

**Petition:** 2 petitioners

#### Summary:

Policy 7.1 (The Norwich Urban Area including the fringe parishes) - Not consistent with national policy

1.41 Policy 7.1 lists the proposed allocations for the Norwich Urban Area including the fringe parishes. This Policy has a figure of 1,771 homes for Cringleford, which is identified as being the "Total deliverable housing commitment 2018 – 2038". This figure is made up of the uplift in the allocation to 1,710 homes and an additional 61 homes that are already consented elsewhere in the village. Whilst Policy GNLP0307/GNLP0327 includes the word 'approximate' before the figure of 1,710 for the Cringleford allocation Policy 7.1 does not. Instead, it identifies the 1,771 figure as being a total. Without there being any clarification that the figures for allocations can be deviated from there is the danger that they may be seen as maximum figures. Especially as Policy 7.1 uses the term 'total', which is not consistent with the Cringleford allocation Policy that permits a more flexible approach to numbers with the use of 'approximately'. Accordingly, the wording of Policy 7.1 would not be consistent with the requirement of paragraph 59 of the NPPF to boost the supply of new homes.

1.42 The use of 'approximate' allows for a deviation from the figure of 1,710 homes for Cringleford and therefore there must be a consistent approach to the figures in the Local Plan where they are not absolute figures. In Policy 1 all the figures are identified as minimum figures. Therefore, the same should apply to the figures for draft allocations. This will allow the final number of new homes to be delivered at each site to be based on a design-led approach that makes efficient use of land by delivering densities that are influenced by "on site characteristics", as required by Policy 2.

#### Change suggested by respondent:

Recommendation

1.43 Policy 7.1 should be amended so that all the figures for the allocations are identified as minimums. Additional text should be added to confirm that developments will be required to make effective use of land with the final number of homes delivered on individual allocations being based on a design-led approach.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** P18-0134 GNLP Reg 19 reps final.pdf - <https://oc2connect.gnlp.org.uk/a/4bs>

24181

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Barratt David Wilson Homes [15660]

**Agent:** Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]

**Petition:** 2 petitioners

### Summary:

Policy 7.5 (Small Scale Windfall Housing Development) - Not effective

1.44 Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous. The use of the term "Positive consideration will be given to self and custom build" does not provide sufficient clarity for the decision maker as to the weight that can be attached to proposals for self-built plots. For example, if the threshold for a parish were to be exceeded by two separate applications that were undetermined would one be approved over the other if it were to be self-build? Whilst it is positive that Policy 7.5 is seen as a mechanism for promoting self-built plots it will be ineffective once the thresholds for individual parishes have been reached.

1.45 It is recommended that self-build plots be specifically referenced in a criterion of Policy 7.5. Given the low numbers presently on the Councils' registers the amendment of Policy 7.5 to positively promote self-build plots will be a more effective way of delivering them than requiring 5% on larger sites. This will speed up the delivery of the larger sites and provide a supply of self-build plots in locations where self-builders want to live.

1.46 Policy 7.5 should be the Councils' primary tool for securing the delivery of self-build plots in order to meet their statutory requirement to promote self-build housing. However, the proposed cap in numbers for each parish would make it less effective in achieving this aim. The amendment of Policy 7.5 to positively provide for self-build plots would also remove the need for 5% of developments of 40 dwellings or more to provide 5% self-build plots as required by Policy 5.

1.47 Prioritising the delivery of self-build plots on the edges of development boundaries is more of a sound policy than relying on large development sites to deliver them. Especially as the approach proposed in Policy 5 has the potential to increase costs and reduce profits for developers, which could delay the delivery of new homes. Moreover, the removal of the obligation from larger developments would maximise the amount of affordable housing that they could deliver in cases where site specific issues may be affecting viability.

### Change suggested by respondent:

Recommendation

1.48 Policy 7.5 should be amended to positively provide plots for self-build over and above the thresholds or small and larger parishes. Please see suggested wording for Policy 7.5 below:

"Other than proposals for self-build, cumulative development permitted under this policy will be no more than 3 dwellings in small parishes or 5 dwellings in larger parishes (as defined in appendix 7) during the lifetime of the plan"

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** P18-0134 GNLP Reg 19 reps final.pdf - <https://oc2connect.gnlp.org.uk/a/4bs>



**Policy 0307/0327, 0307/0327 Policy****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]**Petition:** 2 petitioners**Summary:**

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1.49 In our client's response to the Regulation 18 consultation technical information was submitted to demonstrate that the balance of their site alone has the capacity to accommodate circa 500 new homes. The response included a Framework Plan and Vision Document for the site. Since submitting these details there has not been any discussion with officers about the capacity of the allocation or our client's site. Instead, it appears that the proposed uplift of 410 homes for the Cringleford allocation, which has resulted in the figure of approximately 1,710 homes in the draft policy, has been estimated by officers. The only reference to the process that has led to this estimate is the "further discussions with Development Management colleagues" that is referenced in the Norwich and Urban Fringe Assessment (Cringleford Booklet).

1.50 Whilst there have been addendums to the 2017 HELAA none of these have given further consideration to the Cringleford allocation. In light of the information submitted at the Regulation 18 stage a further assessment of the allocation should have been carried out to justify the proposed uplift. In the absence of this assessment Policy GNLP0307/GNLP0327 is not effective or consistent with the national policy. Therefore, a more flexible approach to numbers identified for the uplift in the allocation is needed to make the most efficient use of land and boost the supply of new homes in accordance with Policy 2 and paragraphs 59 and 117 of the NPPF.

Representation to the Greater Norwich Local Plan Barratt David Wilson Homes

1.51 There is a risk that without caveating that the figure of 1,710 new homes could be increased, which the use of 'approximately' clearly indicates, it may be regarded as a maximum figure. To ensure that the plan is positively prepared and is consistent with achieving sustainable development a design-led approach should be adopted to the uplift in the allocation with the figure of 1,710, or higher based on the evidence submitted at the Regulation 18 stage, being set as a minimum.

1.52 The Cringleford Policy acknowledges that there is flexibility to the education provision on site and that the 3 hectares may not be needed if an equivalent alternative provision can be agreed with the education authority. If the full 3 hectares of land was not required then that would allow for additional homes to be accommodated on the site. This change alone could result in a figure of more than 1,710 new homes being accommodated on the allocation.

1.53 The confirmation from Highways England that the proposed improvement of the A47 Thickthorn interchange can accommodate the proposed uplift is welcomed. Our client's initial transport work indicates that a higher uplift could also be accommodated and this should not therefore represent a constraint to the development potential of the site. In accordance with the wording of the Cringleford Policy this will be confirmed through the submission of a Transport Assessment as part of the planning application for the site.

1.54 The requirement for a vehicular route through the adjacent development site (reference: 2013/1494), capable of serving as a bus route is something that is outside our client's control. Whilst they will work with the neighbouring developer to achieve a bus route, it is unreasonable for it to be a policy requirement as there are no guarantees it will be able to come forward. It is therefore suggested that flexibility is allowed for in the policy wording for a bus route to be provided if demonstrated to be achievable.

1.55 Criterion 7 requires "Provision of a drainage system (SUDs)". It is not necessary for this to be expressly required by

the policy as paragraph 165 of the NPPF and Policy HOU2 of the Cringleford Neighbourhood Plan both require that developments incorporate sustainable drainage systems. Similarly, paragraph 189 of the NPPF requires that the Historic Environment Record be consulted to determine any need for archaeological surveys prior to development (criterion 6). Both these criteria could be deleted from the policy.

Policy Map (below left), with the latter stating that the uplift of 410 homes will be “within settlement boundary”. Whilst this accords with the Proposal Map in the Cringleford Neighbourhood Plan (below right) the extended boundary of the housing allocation does not. If an amendment of the housing allocation boundary is considered acceptable then development should not be unduly constrained by the arbitrarily drawn settlement boundary. Reference to this should be removed from the Policy Map to allow the masterplanning of the site to be based on a design-led approach. This change will not result in a reduction in the buffer between new residential development and the Norwich Southern Bypass. Though it is considered necessary to allow greater flexibility for the layout of the site so that a more organic edge to the village can be created.

1.57 Our client controls 87% of the land identified to accommodate the uplift in the Cringleford allocation. If the uplift were restricted to only 410 homes then they could only deliver 357 of the homes on their land, which would result in a density of 17.68dph. This figure would be well below the average density of 44dph that has been approved on the Newfound Farm site. Clearly, such a low density would not accord with paragraphs 122 and 123 of the 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.

to demonstrate that the remainder of the BDW site at GNL0307 has the capacity to deliver circa 500 homes. These homes can be delivered at a density of 44dph and the site will still deliver a minimum of 2 hectares of green infrastructure per 1,000 population as required by Policy 3. Therefore, even if the use of ‘approximately’ can be used to justify more than 410 homes across both sites it will fall well short of the 500 homes that can be delivered by continuing with the accepted design approach for Newfound Farm.

1.59 The ability to increase the number of new homes in the Cringleford allocation accords with GNLP objective 3 (Homes theme) “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.” It also accords with objective 5 (Housing) and 8 (Health) of the Sustainability Appraisal that identify that “Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision.” and “Development proposals which would locate site end users in close proximity to one of the listed NHS hospitals, a GP surgery and a leisure centre would be expected to have a major positive impact for this objective.”

1.60 Policy 2 seeks to make efficient use of land for development and requires that densities be “dependent on site characteristics”. This point is particularly relevant to the uplift in numbers proposed for Cringleford under Policy GNL0307/GNL0327. The estimated figure for the uplift would fall well below the density of 44dph that was approved for the Newfound Farm development and the density set out in the Framework Plan that was submitted. This higher density will be a material consideration in the determination of the application for the uplift area and the Cringleford allocation policy needs to acknowledge this.

1.61 Based on the 410 homes uplift being an estimate only it is of critical importance that the Local Plan seizes every opportunity to boost housing supply to be in full compliance with paragraph 59 of the NPPF.

**Change suggested by respondent:**

Recommendation:

1.62 In the absence of a justification for the uplift to be restricted to 410 new homes Policy GNLP0307/GNLP0327 should be amended to substitute 'approximately' for 'at least' and the following text should be added:

based on a design-led approach taking into account the characteristics of the sites and the densities of surrounding development."

1.63 Policy GNLP0307/GNLP0327 should also be amended to allow for flexibility in the requirement for a vehicular route through the adjacent development site (reference: 2013/1494) that is outside our client's control. Please see suggested alternative wording for the Policy below:

"If achievable, the layout shall facilitate the future delivery of a vehicular route through the adjacent development site (reference: 2013/1494), capable of serving as a bus route;"

1.64 Finally, the Policy Map should be amended to delete the text "within settlement boundary".

1.65 The suggested additional wording would make the Policy a more effective policy tool in the context of the NPPF's test of soundness (paragraph 35) and make the Plan positively prepared.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** P18-0134 GNLP Reg 19 reps final.pdf - <https://oc2connect.gnlp.org.uk/a/4bs>

24194

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence upon which Policy 2 relies. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations should be supported by evidence.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
 Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
 Phase 3, Horsford, Norfolk, EFM Education Report.pdf - <https://oc2connect.gnlp.org.uk/a/4bj>  
 Horsford Phase 3 Drainage and Utilities Review.pdf - <https://oc2connect.gnlp.org.uk/a/4bk>  
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 4812\_01\_LVA\_Rev A\_email.pdf - <https://oc2connect.gnlp.org.uk/a/4bm>  
 230311-ED-06 - Horsford Phase 3 - Ecological Desk Study.pdf - <https://oc2connect.gnlp.org.uk/a/4bn>  
 Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf -  
<https://oc2connect.gnlp.org.uk/a/4by>

24195

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The settlement hierarchy in the Pre-Submission Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The settlement hierarchy in the Pre-Submission Plan should be based on an up-to-date assessment and reflect current circumstances. Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
 Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
 Phase 3, Horsford, Norfolk, EFM Education Report.pdf - <https://oc2connect.gnlp.org.uk/a/4bj>  
 Horsford Phase 3 Drainage and Utilities Review.pdf - <https://oc2connect.gnlp.org.uk/a/4bk>  
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 4812\_01\_LVA\_Rev A\_email.pdf - <https://oc2connect.gnlp.org.uk/a/4bm>  
 230311-ED-06 - Horsford Phase 3 - Ecological Desk Study.pdf - <https://oc2connect.gnlp.org.uk/a/4bn>  
 Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf - <https://oc2connect.gnlp.org.uk/a/4by>

24196

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: There is no evidence or justification for the proposed 33% requirement as set out in the Pre-Submission Plan; and the reference to 'at least' requires clarification. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: Evidence and justification should be provided for the proposed 33% requirement as set out in the Pre-Submission Plan; and the reference to 'at least' should be clarified.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
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Horsford Phase 3 Drainage and Utilities Review.pdf - <https://oc2connect.gnlp.org.uk/a/4bk>  
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4812\_01\_LVA\_Rev A\_email.pdf - <https://oc2connect.gnlp.org.uk/a/4bm>  
230311-ED-06 - Horsford Phase 3 - Ecological Desk Study.pdf - <https://oc2connect.gnlp.org.uk/a/4bn>  
Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf -  
<https://oc2connect.gnlp.org.uk/a/4by>

24197

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The Pre-Submission Plan fails to sufficiently demonstrate that a policy requirement that development comply with the NDSS is 'needed', and notwithstanding this, nor does it include sufficient justification. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The Pre-Submission Plan should demonstrate a 'need' for a policy requirement that development comply with the NDSS, and provide sufficient justification for this.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
 Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
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 Horsford Phase 3 Drainage and Utilities Review.pdf - <https://oc2connect.gnlp.org.uk/a/4bk>  
 2018.11.06 - Phase 3 Capacity Assessment Note Rev C.PDF - <https://oc2connect.gnlp.org.uk/a/4bz>  
 4812\_01\_LVA\_Rev A\_email.pdf - <https://oc2connect.gnlp.org.uk/a/4bm>  
 230311-ED-06 - Horsford Phase 3 - Ecological Desk Study.pdf - <https://oc2connect.gnlp.org.uk/a/4bn>  
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<https://oc2connect.gnlp.org.uk/a/4by>

24198

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The settlement hierarchy in the Pre-Submission Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The settlement hierarchy in the Pre-Submission Plan should be based on an up-to-date assessment and reflect current circumstances. Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
Phase 3, Horsford, Norfolk, EFM Education Report.pdf - <https://oc2connect.gnlp.org.uk/a/4bj>  
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Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf - <https://oc2connect.gnlp.org.uk/a/4by>



24199

Object

**Horsford, Settlement Map****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The HELAA assessment is factually incorrect and there is no remaining evidence or justification for the non-allocation of Site Ref. GNLP2160. As such, the Pre-Submission Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: Site Ref. GNLP2160 should be allocated for approximately 350 homes and supporting uses.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
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Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf -  
<https://oc2connect.gnlp.org.uk/a/4by>

24200

Object

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**Foreword****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The statement in the Foreword therefore needs correcting. Exactly what corrections are required will depend on the answers to the queries we raise in relation to Policy 1.

**Change suggested by respondent:**

Please see attached letter

In summary: The statement in the Foreword therefore needs correcting. Exactly what corrections are required will depend on the answers to the queries we raise in relation to Policy 1.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
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Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf -  
<https://oc2connect.gnlp.org.uk/a/4by>

24201

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The Pre-Submission Plan fails to sufficiently demonstrate that it will be possible to demonstrate a 5YHLS on adoption of the Plan. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The Pre-Submission Plan should demonstrate that it will be possible to demonstrate a 5YHLS on adoption of the Plan.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
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Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf -  
<https://oc2connect.gnlp.org.uk/a/4by>

24202

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The Pre-Submission Plan, in failing to identify a 'housing requirement' figure other than the minimum Standard Method Local Housing Need figure, fails to take into account evidence of higher levels of housing needs, or to plan for a level of housing need that reflects other parts of plan, specifically drivers for economic growth, and is thus contrary to the PPG. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The Pre-Submission Plan should identify a 'housing requirement' figure that takes into account evidence of higher levels of housing needs, and plans for a level of housing need that reflects other parts of the Plan, specifically drivers for economic growth.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
 Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
 Phase 3, Horsford, Norfolk, EFM Education Report.pdf - <https://oc2connect.gnlp.org.uk/a/4bj>  
 Horsford Phase 3 Drainage and Utilities Review.pdf - <https://oc2connect.gnlp.org.uk/a/4bk>  
 2018.11.06 - Phase 3 Capacity Assessment Note Rev C.PDF - <https://oc2connect.gnlp.org.uk/a/4bz>  
 4812\_01\_LVA\_Rev A\_email.pdf - <https://oc2connect.gnlp.org.uk/a/4bm>  
 230311-ED-06 - Horsford Phase 3 - Ecological Desk Study.pdf - <https://oc2connect.gnlp.org.uk/a/4bn>  
 Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf - <https://oc2connect.gnlp.org.uk/a/4by>

24203

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Barratt David Wilson Homes [15660]**Agent:** Savills (Mr Jonathan Dixon, Director - Planning) [12969]**Petition:** 2 petitioners**Summary:**

Please see attached letter

In summary: The Pre-Submission Plan establishes the Standard Method Local Housing Need figure, but fails to undertake any further steps, or identify a 'housing requirement' figure, contrary to the PPG. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Please see attached letter

In summary: The Pre-Submission Plan should identify a 'housing requirement' figure.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 367778 Reps to R19 GNLP FINAL 22 03 21.pdf - <https://oc2connect.gnlp.org.uk/a/4bh>  
 Horsford, Norfolk DBA Final March 2020. R.pdf - <https://oc2connect.gnlp.org.uk/a/4bx>  
 Phase 3, Horsford, Norfolk, EFM Education Report.pdf - <https://oc2connect.gnlp.org.uk/a/4bj>  
 Horsford Phase 3 Drainage and Utilities Review.pdf - <https://oc2connect.gnlp.org.uk/a/4bk>  
 2018.11.06 - Phase 3 Capacity Assessment Note Rev C.PDF - <https://oc2connect.gnlp.org.uk/a/4bz>  
 4812\_01\_LVA\_Rev A\_email.pdf - <https://oc2connect.gnlp.org.uk/a/4bm>  
 230311-ED-06 - Horsford Phase 3 - Ecological Desk Study.pdf - <https://oc2connect.gnlp.org.uk/a/4bn>  
 Horsford Phase 3 Vision Document\_March 2020\_compressed.pdf - <https://oc2connect.gnlp.org.uk/a/4by>

23293

Object

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**Policy 0520, 0520 Policy****Respondent:** Mr Geof Bedford [19004]**Summary:**

Hingham Road Safety Campaign's November 2020 report findings are that the Norwich Road, Hingham is "unfit for the 21st century". In a separate document (attached) we highlight the historic on-going issues that still exist with specific reference to GNLPO520, questioning and denying the soundness of this site preference. These cover planning, access, traffic calming and pedestrian issues, and conclude that approval of this development would also permanently block necessary improvements being made to a "very troubled principal town access".

**Change suggested by respondent:**

No modifications appear possible that would make the application sound.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** GNLPO520 -Regn 19 submission Norwich Road - by HRSC .pdf - <https://oc2connect.gnlp.org.uk/a/44r>

23672

Object

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**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]

**Summary:****Housing needs**

3. The Council state that the application of the standard method results in a minimum housing need across the plan period 2018 to 2038 of 40,541 homes – 2,027 dwelling per annum (dpa). However, we could not find in the Council's evidence any clarity as to which years have been used in terms of household growth and the affordability ratio. It would be helpful if the Council could provide a statement on this matter on submission of the local plan and any justification for the data used.

4. It is also important to note that the application of the standard method and the resulting local housing needs assessment is the minimum level of housing needs local planning authorities are required to meet. Planning Practice Guidance states at paragraph 2a-010 that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This paragraph goes on to outline three such situations.

5. One of the situations identified in PPG is the presence of a strategy in an area that is in place to facilitate additional growth. It is therefore important to consider the City Deal<sup>1</sup> agreed with Government in December 2013. This deal committed the authorities in the Greater Norwich area, in return for significant additional funding, to achieve growth above what was being planned for the area. In relation to housing the City Deal states the Councils in the Greater Norwich Area would deliver an additional 3,000 homes above the Core Strategy target of 36,820 homes by 2026. In short there was a commitment that circa 40,000 homes would have been built between 2008 and 2026 - over 2,200 dpa. Between 2008/09 and 2017/18 the Councils' monitoring reports show that 15,472 new homes were built. When this is added to the number of homes expected be delivered between 2018/19 and 2025/26 (20,871 new homes) there is a shortfall in delivery of 3,477 against its commitment in the City Deal. This shortfall suggests that there will be a higher minimum level of housing need in this plan than results from the standard method. The HBF considers it to be essential that the Council continues to support the level of growth it committed to in the City Deal, and this must be reflected in the GNLP's housing requirement.

**Housing supply**

6. With regard to supply the HBF welcomes the Council's decision to include a substantial buffer between its housing requirement and housing supply. This is essential in order to ensure the plan has sufficient flexibility to meet needs in full across the plan period. However, whilst the Council has included a housing trajectory at Appendix 6 of the GNLP we could not find included in the evidence as to when each of the allocated sites is expected to contribute to this supply. This evidence is an essential part of any local plan examination as it ensures effective scrutiny of the delivery assumptions made with regard to each site and whether these assumptions are sound. In particular it is important part of any discussion regarding the 5-year housing land supply and whether the development supporting supply in the first five years of the plan is deliverable as defined in the National Planning Policy Framework (NPPF).

**Change suggested by respondent:****Recommendation**

7. We would recommend that the Council submits the more detailed evidence on supply alongside the Local Plan and as such we reserve the right to comment at the examination in public on land supply once the relevant evidence has been published.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45z>

23673

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities**

**Respondent:** Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]

**Summary:**

8. Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous. As such we are concerned that the third bullet point of part 9 of policy 2 states that “If the potential to set more demanding standards local is established by the Government the highest standard will be applied in Greater Norwich” as this could lead the Councils seek to apply a higher optional standard should such an approach be maintained. Should an optional standard that is higher than that in this local plan be allowed by Government then it will be for the Councils to undertake partial review of the plan. If a higher standard is required through building regulations, then this will be mandatory and as such the statement highlighted above is redundant. We would therefore suggest the phrase mentioned above is deleted.

9. We also note that part 2 of this policy mentions that development proposals will need to make provision for electric vehicles. However, the local plan does not state the level of provision that is considered acceptable but will instead rely on supplementary guidance to set out the detail of any expectations. Firstly, it is not appropriate to set out the requirements of such a policy in a supplementary planning document. The relevant legislation defining Local Plans and SPDs and their status as policy documents is the Town and Country Planning Regulations (2012). These define an SPD in regulation 2 as “any document of a description referred to in regulation 5 (except and adopted policies map or statement of community involvement) which is not a local plan.” Therefore, it can be concluded, as stated above, that whilst SPDs are Local Development Documents they are not local plans. It is also important to note that regulation 2 defines the local plan as:

“any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and for the purposes of section 17(7)(a) of the Act these documents are prescribed as development plan document”.

10. Regulation 5 in turn states:

“5(1) For the purposes of section 17(7)(za)(1) of the Act the documents which are to be prepared as local development documents are—

(a) any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—

(i) the development and use of land which the local planning authority wish to encourage during any specified period;

(ii) the allocation of sites for a particular type of development or use;

(iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and

(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission;”

11. Taken together these regulations mean that a local plan is a document that contains statements as to the:

- development and use of land which the local planning authority wish to encourage during any specified period;
- allocation of sites for a particular type of development or use; and
- development management and site allocation policies, which are intended to guide the determination of applications for planning permission.

12. We would suggest that the detail as to how many electric vehicle charging points should be provided falls under regulation 5(1)(a)(iv) and are development management policies which are intended to guide the determination of applications for planning permission and should only be adopted in a local plan following the prescribed process. This issue was explored in detail in the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council. In this case Justice Gilbart quashed the SPD on the grounds that it contained policies that should have been contained in the local plan because they could be considered to fall under regulation 5(1)(a)(i) and 5(1)(a)(iv).

13. This leads to our second point which is that if the Council are requiring the provision of electric vehicle charging points then this should have been considered in the Viability Appraisal. We could not find within that appraisal any consideration of, or allowance made for, this policy. The HBF supports the use of electric and hybrid vehicles and the introduction of the necessary supporting infrastructure, however, it is the industry’s preference for a national approach to the provision of charging points rather than local authorities setting their own standards.

14. The Government has recognised in recent consultations the possible impact of any requirement to provide electric vehicle charging points on housing supply, where the requirements are not technically feasible. The same consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of Electric



Vehicle Charging Points (EVCP) in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment.

15. Where such costs are high the Government are proposing that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In instances where the additional costs are likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

**Change suggested by respondent:**

Recommendation

16. We suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45z>

23674

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]**Summary:**

17. This policy requires all development to deliver a significant enhancement of at least a 10% net gain for biodiversity in accordance with the Environment Act. However, it is important to note that the legislation does not set this as a minimum and the Council should not to seek to do so either. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline providing certainty in achieving environmental outcomes, deliverability of development and costs for developers. As such the Council should not specify a requirement above 10%. The prefix "at least" should be deleted. This would not prevent a developer from going further but it ensures clarity to decision makers that a scheme delivering a 10% net gain is compliant with the legislation.

18. In addition, the Council have not appear to have included the impact of a 10% net gain in biodiversity on development in the Greater Norwich Area. There are significant additional costs associated with biodiversity gain. The impact assessment produced by DEFRA to support the consultation on Biodiversity Net Gain & Local Nature Recovery Strategies sets out in table 14 the costs of implementing a 10% net gain. In the East of England, it was estimated that it would cost £18,329 per hectare based on a central estimate. However, there are significant increases in costs to £62,983 per hectare for off-site delivery under Scenario C. There may also be an impact on the net developable area of site that will need to be considered in the viability assessment.

19. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay, or reduce housing delivery. It is therefore important that the full cumulative costs on development are considered in the local plan and this must be addressed prior to submission. Without the inclusion of this additional cost the Council cannot provide the required certainty that the plan and the sites it has allocated are deliverable.

**Change suggested by respondent:**

Recommendation

20. The Council should:

- Delete the prefix "at least" to the 10% requirement for net gain; and
- Consider the impact on viability from the additional cost of delivering a 10% net gain in biodiversity.

Legally No  
compliant:

Sound: Not specified

Comply with Not specified

duty:

Appear exam: Not specified

Attachments: Full Representation - <https://oc2connect.gnlp.org.uk/a/45z>

23675

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]**Summary:**

The proportion of homes required to be affordable, and the adoption of space standards are both unsound as they have not be adequately justified.

Affordable housing

21. In the GNLP it is stated in paragraph 271 that the SHMA has identified need for 11,030 affordable homes between 2015 and 2038 – 28% of housing need identified at that point. However, the Greater Norwich Authority Monitoring Report (GNAMR) last year shows that between 2015/16 and 2017/18 a total of 1,209 affordable homes were delivered in the Greater Norwich area. This would mean that over the plan period there would be a need to deliver 9,281 affordable

homes – around 23% of the housing requirement and 18% of expected supply. We recognise that only major development will be required to deliver new affordable homes and as such a higher percentage is required in policy to ensure needs are met. However, we have calculated on the basis of table 6 and appendix B of the GNAMR that the Councils expect to deliver 40,531 of the homes to be built in the remaining plan period will be on sites defined as major allocations<sup>2</sup>. This would mean that affordable housing needs was 23% of planned supply. If supply in 2018/19 of 724 new affordable homes is taken into account this reduces to 21%. It would appear on the basis of the evidence presented that the affordable housing policy is likely to deliver an oversupply of affordable homes in the Greater Norwich area and that the requirement in Policy 5 should be reduced accordingly.

#### Affordable home ownership

22. This policy states that the mix of tenure for affordable homes will include 10% for affordable home ownership. This policy is not consistent with paragraph 64 of the NPPF which expects 10% of all homes provided on major development to be made available for affordable home ownership. It is also important to note that this 10% forms part of the affordable housing provision. The only reason why this national policy should not be adopted by the Council are if its application would exceed the overall level of affordable housing required for an area or significantly prejudice the Council's ability to meet the needs of specific groups should this requirement not be applied. Unless compelling evidence is provided to the contrary the GNLP should therefore be amended to reflect national policy.

#### Space standards

23. The Councils are seeking to adopt the national described space standards across the Greater Norwich Area. Whilst the HBF share the Council's desire for good quality homes delivered within Watford it is essential that the Council provide the necessary justification, as required by footnote 46 of paragraph 127 of the NPPF which states:

"Policies may also make use of the nationally described space standard, where the need for an internal space standard is justified."

24. It is important that space standards are justified as space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes to afford a property which has their required number of bedrooms.

25. Given the poor affordability of property across the Greater Norwich area it is important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy. However, we could not find any evidence prepared by the Councils to suggest that development below space standards is an endemic concern within the Greater Norwich area. As such we would suggest that the requirement to meet NDSS is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.

#### Self-Build/ Custom Housebuilding

26. Whilst the HBF support the encouragement of self-build housing through local plans, we do not consider the requirement for all development of 40 or more dwellings to set aside 5% of homes on site to be delivered through serviced plots for self-build and custom housebuilding to be justified or consistent with national policy.

27. As the Council will be aware the proposed policy must be based on robust evidence of both the demand for self-build plots and a consideration as to the impact on viability of this policy. With regard to the evidence on needs the states that there are currently 113 applicants on the self-build register across Greater Norwich.

28. Firstly, this does not suggest that there is a high level of demand for self-build plots that requires five percent of all market homes on sites of over 40 units to be offered as plots to self-builders. The Council will therefore need to consider how many homes their policy is likely to provide and whether it is proportionate to the evidence. It is also necessary for the Council to indicate how many self-build homes have been granted permission since the requirement to maintain a self-build register was introduced. This will give a clearer indication as to how many plots are provided as windfall and will need to be taken into account in assessing how demand for self-build plots can be met.

29. Secondly, the Council will also need to consider the robustness of their self-build register as an evidence base indicating demand for self-build plots. This is vital as the data on self-build registers is often flawed in that it does not consider whether individuals on such registers are on other registers in neighbouring areas and whether those on the list are still seeking a self-build plot. If the register has not been reviewed in this manner, we would suggest this is

undertaken prior to the submission of the local plan.

30. Thirdly, it is important to recognise that paragraphs 57-024 and 57-025 of the PPG sets out a variety of approaches that need to be considered – including the use of the Council’s own land. This is reiterated in para 57-014 of the PPG which sets out the need for Council’s to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We would suggest that in the first instance rather than place additional burdens on house builders for the provision of self-build plots it should utilise its own land or seek to engage with landowners to identify suitable sites on which to deliver serviced self-build plots. Therefore, on the basis of the evidence presented we would suggest that there is, at present, insufficient justification for that 5% of plots on developments of 40 units or more should be provided for self-build or custom housebuilding.

**Change suggested by respondent:**

Recommendation

31. The Council should:

- Reduce the affordable housing requirement to reflect the evidence on the need for such homes;
- Without the required evidence the requirement for development to meet national described space standards must be deleted; and
- The requirement for 5% of homes on sites of 40 or more dwellings to be allocated to self-build or custom housebuilding should be deleted.

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Appear exam: Not specified

Attachments: Full Representation - <https://oc2connect.gnlp.org.uk/a/45z>

23294

Object

**Policy 0311 0595 2060, 4.6**

Respondent: Mrs Sara Bell [19810]

**Summary:**

This site is illegal due to lack of consultation for TWO sites for Aylsham. There are already insufficient leisure facilities, doctors surgeries, social care and green spaces.

This plan is detrimental to maintaining Aylsham's historic medieval character and it interferes with the sense of community by introducing unsustainable numbers of people and overcrowding of facilities. This despite the declaration in The Aylsham Neighbourhood Plan that it is vital to protect the historic medieval character and it's sense of community.

**Change suggested by respondent:**

This plan should be scrapped.

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

24390

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Ben Burgess Ltd [16987]**Agent:** CODE Development Planners Ltd (Miss Helen Adcock, Director) [12557]**Summary:**

See attachments for full submission and supporting information

**4 Conclusion**

4.1 Ben Burgess contends that as currently drafted the GNLP would fail when considered against the legal requirements and the tests of soundness in accordance with paragraph 35 of the NPPF. Previous representations have been submitted demonstrating that the proposal for a new Ben Burgess headquarters on land west of Ipswich Road, Swainsthorpe is deliverable and would constitute sustainable economic development. In the absence of an allocation in respect of land west of Ipswich Road, Swainsthorpe the GNLP does not explain how, in accordance with paragraph 82 of the NPPF, how the locational requirements of the particular sector within which Ben Burgess operates has been address. Ben Burgess wishes to engage with officers of the GNLP team ahead of the regulation 19 stage of the GNLP to identify reasonable alternatives.

4.2 These representations contend that an examination of the GNLP (Part 1: The Strategy and Part 2: The Sites) and supporting evidence base demonstrate that the GNLP does not fulfil the necessary requirements. The evidence base fails to consider the specific requirements associated with the industry in order to justify the claim "evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich". The decision to designate to development management contradicts the very foundation of a policy led planning system.

4.3 On the basis of the above Ben Burgess contend that land west of Ipswich Road, Swainsthorpe should be allocated within the GNLP as an employment site failure to do so would render the plan unsound.

**Change suggested by respondent:**

See attachment for suggested modification to policy 6 to include the Ben Burgess site at Swainsthorpe.

4.3 On the basis of the above Ben Burgess contend that land west of Ipswich Road, Swainsthorpe should be allocated within the GNLP as an employment site failure to do so would render the plan unsound.

**Legally compliant:** No

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** Submission Form - <https://oc2connect.gnlp.org.uk/a/4f5>

001 AssessmentOfAlternativeSitesPart1January2019.pdf - <https://oc2connect.gnlp.org.uk/a/4f6>

002 AssessmentOfAlternativeSitesPart2November2018.pdf - <https://oc2connect.gnlp.org.uk/a/4f7>

003 AddendumToAssessmentOfAlternativeSitesJuly2020.pdf - <https://oc2connect.gnlp.org.uk/a/4f8>

004 BenBurgessBackgroundAndContextToNeedForRelocationJuly2020.pdf - <https://oc2connect.gnlp.org.uk/a/4f9>

005 Drw1515-2-revO\_SiteLocation.pdf - <https://oc2connect.gnlp.org.uk/a/4fv>

006 Drw1515-3B-revE\_BlockPlan.pdf - <https://oc2connect.gnlp.org.uk/a/4fb>

23653

Object

**Policy 0596R, 0596R Policy****Respondent:** Joan Bennett [19845]**Summary:**

One site was agreed for Aylsham under Regulation 18. This proposal for another site under regulation 19 has had no consultation locally and is therefore not legally compliant. Regulation 19 fails to consider the impact of two sites for Aylsham on the infrastructure of the town, schools, health facilities, roads and traffic, and is therefore not sound.

**Change suggested by respondent:**

There should not be a second site. If it is to be considered, there should be full public consultation and due consideration must be made to the infrastructure of Aylsham with any development phased so that infrastructure can improved before houses are built

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23267

Object

**What is the Local Plan?, 1****Respondent:** Mr Trevor Bennett [14599]**Summary:**

Failure to work closely with North Norfolk

**Change suggested by respondent:**

Work closely with North Norfolk, plans for development there have a much greater impact on Aylsham than developments in South Norfolk

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23266

Object

**Foreword****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The decision to increase the number of new homes to 49500 is a political decision rather than based on need. There is a demand for considerably more new homes by inward migration, but there the need for more affordable homes could be met by the number of new homes in regulation 18. This means the number is not sound and does not meet legal compliance as there was no consultation.

**Change suggested by respondent:**

In respect of the number of new homes stay at the regulation 18 figure and aim to meet the need for more affordable homes by building homes run by the council.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23268

Object

**Aylsham, 4.1****Respondent:** Mr Trevor Bennett [14599]**Summary:**

Reg. 18 put forward one site for Aylsham with 300 homes. There has been no consultation in respect of Reg. 19 where there are two sites 550 homes, an increase of 83% on the homes consulted upon in Reg. 18. This is not legally compliant with LPA's Statement of Community Involvement [SCI], 1.6 Paragraph 155 of the National Planning Policy Framework (2012) and Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate ]

**Change suggested by respondent:**

The second site put forward in Reg 19 for Aylsham should be withdrawn as the decision is not legally compliant due to a failure of consultation.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23269

Object

**Aylsham, 4.4****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The plan is not positively prepared or justified in respect of allocating two sites and 550 homes without consideration of the infrastructure needs of the town, which are under strain from two recent developments of 550 new homes. To have one site under Reg.18 would have created problems, to have two sites magnifies the issue of infrastructure. There are problems of water supply and sewage disposal, the road network through the town will not cope with the extra traffic generated, the health and social care system and the education system will not cope with a population increase of 20%.

**Change suggested by respondent:**

The second site for Aylsham under Reg. 19 should be withdrawn.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23270

Object

**Aylsham, 4.5****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The decision to allocate 550 more homes when there are still homes to be completed is unsound due to the impact on the infrastructure of the town. There is no indication as to when the Primary School would be built, when all the schools in Aylsham and the surrounding area are at capacity now. The decision to put forward a care home demonstrates a lack of consultation, not just with the Town, but also Aylsham Care Trust. This allocation is also in conflict with points 132 and 136 of the GNLP's strategy.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn from Reg.19. Consultation should also be introduced with Town Council for the first site, in respect of the infrastructure needs of the town.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None



23271

Object

**Policy 0311 0595 2060, 4.6****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This site does meet legal requirement as it was part of the consultation process of Reg.18. However, the CPRE response does highlight that both sites do not meet climate change targets. This site allocates a primary school, but there are no details as to when this will come forward. There is no capacity in Aylsham schools currently and the full impact of the new housing at Bure Meadows and Willow Park is still to be felt. The developers of this site have put in some road improvements near the site, but not considered the other problems with Burgh Road.

**Change suggested by respondent:**

1. The primary school should be in the first stage of development;
2. Before any further development Aylsham should have improved health and care facilities with a viable medical centre, including a doctor's surgery, and a day care centre as put forward by ACT;
3. There must be a viable road management system with increased parking to be able to meet the needs of an increased population;
4. There must be significant improvements to the water supply and water management system before further development;

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23272

Object

**Policy 0596R, 4.7****Respondent:** Mr Trevor Bennett [14599]**Summary:**

As the Burgh Road site was agreed through consultation in reg.18, this is the second site. Reg 19 states there will be two sites, which has never been consulted. Therefore, this means that this site has failed to be legally compliant. The second site should also be rejected on the impact on the carbon footprint.

**Change suggested by respondent:**

The second site should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23273

Object

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**Policy 0596R, 4.8****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This site is not legally compliant on the grounds of lack of consultation on Aylsham having two sites.

This site is not sound due to the lack of consultation on infrastructure in respect of education, health and social care and green infrastructure.

**Change suggested by respondent:**

The second site for Aylsham under Reg. 19 should be withdrawn as it is not sound nor legally compliant.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23274

Object

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**Policy 0596R, 4.9****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This comment is both unsound and fails to be legally compliant as there was no consultation with the Town Council on Reg.19, only on Reg.18 when there were plans for one site.

**Change suggested by respondent:**

The comment on consultation should be taken out of the document as it is not true on Reg.19. Therefore the second site for Aylsham should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23275

Object

**Policy 0596R, 4.10****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This has taken some ideas from "Shaping Aylsham's Future" but failed to put them in context, implying a lack of soundness. They also referred to one site being developed not two. A second site would provide significant issues for infrastructure that are not appropriate for the layout of a Medieval Town. There are also areas of lack of a sound approach in the wording that could lead to further development.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn. There are no improvements that the plan could make to ensure that a second site is of benefit to this area of Norfolk and Reg. 19 has significantly failed respond to the needs of the community.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23276

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This land should not be used for residential development as there has been no consultation on a second site, therefore it is not legally compliant. This is also true of the impact on the carbon neutral aims of Central Government, which are challenged by a second site. It is also unsound due to the failure to meet the infrastructure needs of the Town. There has been no consultation on the care home, the road improvements are limited to the vicinity of the site and the community use of the land offered.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn from Reg. 19. The infrastructure needs of the Town need addressing before any further development. The two recent developments failed to be of benefit for the majority of people who live in the Town.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23281

Object

**Population, Greater Norwich estimated population 2018 to 3028 graph****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The estimate for population increase in Greater Norwich depends on 3 main factors: increased birth rate, which is now in decline, death rate which had been falling, but not in the past year and migration into the area. This will depend not just on demand, which will be high, but also supply. By putting forward a high numbers of homes to be built the increase in supply will increase the demand. That is not a sound policy for an area whose economic future is not as bright as the GNLPL imagines. Brexit will also mean less migrants from abroad.

**Change suggested by respondent:**

Be aware that population estimates are rarely accurate and that they can be controlled. Therefore do not have policies that increase the population.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23282

Object

**The Cycle Network, 88****Respondent:** Mr Trevor Bennett [14599]**Summary:**

It is an exaggeration to state that there is a good network of cycle links to Norwich. The Marriot's way is both a good cycle track and footpath, but it is not an adequate route into Norwich from the North of the County for people wanting to cycle to Norwich for work. The lack of awareness of the cycle paths make this point unsound.

**Change suggested by respondent:**

If there is to be any further development to the North of Norwich as proposed at Aylsham there needs to be investment in a suitable cycle path from Aylsham to Norwich.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23288

Object

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Mr Trevor Bennett [14599]**Summary:**

Burgh Road was the site put forward at the end of Reg.18 where there was consultation and even though some residents preferred a different site the GNLP opted for Burgh Road the decision is legally compliant. However, there has been a lack of consultation in respect of the infrastructure needs. There will be improvement at the southern end of Burgh Road, but no mention of the northern end, where there are major difficulties. There has been no comment on when the primary school will be built. These two major issues make this unsound.

**Change suggested by respondent:**

The plan should state that the primary school will be in the first stage of the development.  
There should be major improvements made to Burgh Road near the Town Centre.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23289

Object

**Aylsham, 4.2****Respondent:** Mr Trevor Bennett [14599]**Summary:**

There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham. Therefore this section is not sound.

**Change suggested by respondent:**

It would be helpful if the GNLP was to produce a plan that significantly impacts upon Aylsham they should discuss with the Town Council to ensure their information is correct.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23290

Object

**Aylsham, 4.2****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This part of the plan lacks soundness as it has factual inaccuracies in respect of comments such as "its weekly Friday market" that indicate that the person responsible for the information is unfamiliar with Aylsham. This also brings into question the basis on which the decision to allocate two sites on a town with a lack of knowledge and then without consultation.

**Change suggested by respondent:**

The second site allocated for Aylsham should be withdrawn and the GNLP board should undertake full consultation with residents and the Town Council to ensure they understand the issues within the town and its strengths.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23384

Support

**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This should be the way forward to both increase the number of homes and the variety of these homes with more self-build.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23385

Support

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**Introduction, 301****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This is the way to increase the number of new homes and give opportunity for self-build

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23392

Support

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**Policy AYL3, 4.11****Respondent:** Mr Trevor Bennett [14599]**Summary:**

As Chairman of the Town Council we continue to support companies that wish to establish themselves at Dunkirk

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23393

Support

**Policy AYL4, 4.12****Respondent:** Mr Trevor Bennett [14599]**Summary:**

There has been interest and some companies moving into Dunkirk recently and this needs to be supported for local employment

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23347

Object

**Communities, 132****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This aim does not appear to apply to Aylsham, where 550 new homes have been allocated to a town that is struggling with the last two developments, also of over 550 new homes. The schools are full, the health care services are inadequate and effectively less than 1981 when the population was below 5,000, as against a population of over 8,000. The road network based around a late medieval road network did not cope pre-covid and will not once normality is returned and parking is a real problem. Therefore this is an unsound policy in respect of Aylsham.

**Change suggested by respondent:**

There should really be no further development until there are marked improvements in the infrastructure. However, Reg.18 did involve appropriate consultation and opted for one site for Aylsham. Reg. 19 is neither legally compliant or sound, therefore the second site should be withdrawn and emphasis should be on building a new primary school prior to commencement of any building, improving the health and social care facilities and implementing effective changes to the road network, once the Town Council Working Party has come forward with its recommendations.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



23353

Object

**Homes, 133****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The aim appears clear, but previous recent developments have failed to produce high quality homes with the continual support of major developers whose primary aim is profit. The recent developments have produced few benefits for the Town of Aylsham with significant increase in the pressure on all aspects of the infrastructure. The question of the need for more social housing has never been addressed in Broadland. These issues indicate that the this is not a sound policy.

**Change suggested by respondent:**

Until there is significant investment in infrastructure before more building of a high number of homes, communities will not thrive or prosper. There needs to be investment from government, both local and central that is not dependent upon income from areas such as section 106 that are tied to developers. It would then be possible to consider how communities may grow. Any knowledge of the developments of Britain post World War 2 give clear examples of how this is possible.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23359

Object

**Homes, 136****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This policy is unsound as the reality of the plan is that due to a lack of consultation and the information in point 136 is unsound as it is not accurate. By putting forward too many homes it will lead to poor services, notably significant pressure on medical care, education, the traffic network and parking. If previous developments are an indication they will not enhance local character.

**Change suggested by respondent:**

These problems could have been avoided with full consultation with the Town and have a more manageable amount of new homes to be built. Therefore for Aylsham the second site should be withdrawn and full consultation held as to how to improve the infrastructure of the Town to meet the demands of 300 new homes from the first site in Reg.18.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23362

Object

**Homes, 137****Respondent:** Mr Trevor Bennett [14599]**Summary:**

From the outline plans it can be seen that the developers are working towards too high a density in the sites to enable sufficient green space. In addition the homes do not appear to be relevant to the changing nature of homes in regard to environmental pressures and the growth of working from home. In Aylsham the unsound decision to allocate two sites will further put too much pressure on the community.

**Change suggested by respondent:**

Cut the numbers of homes provided for Greater Norwich and build them at a lower density

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23368

Object

**Infrastructure, 138****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The western link will create significant damage to the environment with destruction of valuable habitats in the Wensum Valley and damage to precious chalk streams. This policy is in conflict with the green agenda that is expressed later in the strategy and therefore is unsound.

**Change suggested by respondent:**

Cut back on the number of new homes built to the Reg.18 figure and therefore put less pressure on the environment.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23372

Object

**Infrastructure, 141****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This policy is unsound as it is in conflict with the demand for so many new homes. By increasing the number of new homes in the main towns, by a higher percentage in Reg.19 than in Reg 18, than Norwich it will mean more people using cars to come into the city. By putting forward 550 new homes for Aylsham with poor cycle links and an inadequate bus service, as well as no train there will a significant increase in road traffic into Norwich.

**Change suggested by respondent:**

Cut the number of new homes in the main towns, back to Reg.18 figures as at least that regulation had consultation and was legally compliant.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23382

Object

**Infrastructure, 143****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This strategy is unsound as it will not happen given the past policies. Health services have declined in Aylsham during the last 40 years, despite an increase in population of 70% through large developments. At present the plans appear to be for replacing a primary school once the homes are built when all the schools are full now.

**Change suggested by respondent:**

Until local authorities and central governments are prepared to finance improvements in the infrastructure of towns the community needs will not be met. In respect of Aylsham a new primary school needs to be built before any houses and the medical centre at the site of the old hospital be properly established for the benefit of the community.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23383

Object

**Introduction, 303****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The fact that this is the strategy for 3 councils working together it would be expected that it would be finished in all 3 areas. The fact that South Norfolk has no allocations in the village clusters makes this at best unsound if not legally compliant. By increasing the numbers of new homes by over 5000 in Reg.19 from Reg.18 without consultation and not including South Norfolk villages means that other areas have had increased allocations.

**Change suggested by respondent:**

Withdraw all increased allocations form Re.18 to Reg 19 until there has been both consultation and South Norfolk has drawn up its village cluster allocations.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23386

Object

**Policy 7.4 Village Clusters, 382****Respondent:** Mr Trevor Bennett [14599]**Summary:**

I consider that the failure to include South Norfolk villages makes the whole plan not legally compliant. The GNLP puts forward its strategy as 3 councils working together and has increased the number of homes to over 49000 in Reg.19 without consultation, whilst ignoring one significant area of the region.

**Change suggested by respondent:**

Though many other parts of Reg.19 are not legally compliant or sound it is this failure that should mean Reg.19 is withdrawn until there is full consultation and the the area of village clusters and other sites that have been given planning permission not in the Plan are considered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23387

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This policy is not legally compliant as there has been no consultation with either the Town Council or other residents and associations as to the increase from Reg.18 of new homes from 300 to the 550 homes in Reg.19. In addition this policy is unsound as it has failed to take into account that within the last 5 years there have been two new large developments and other smaller ones that are only now meeting completion.

**Change suggested by respondent:**

Return the figures for new homes to Reg.18. Not only should the second site in Aylsham be withdrawn, Reg.19 should be withdrawn until it has had proper consultation and discussion on the numerous errors within it.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23388

Object

**Aylsham, 350****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This summary of Aylsham is unsound as it has too many comments that are questionable. Though the town does have a good range of shops, its services are struggling, rather than good. The schools are all at capacity, the road network and parking have proved inadequate for absorbing the recent developments, and the medical practises are struggling with the increase in population of over 20% in the past ten years. The employment opportunities and a significant number of the employed residents of the town drive to Aylsham for work. All these problems are present without further development.

**Change suggested by respondent:**

In respect of Aylsham the second site for Aylsham in Reg.19 must be withdrawn. In regard to the whole document I suggest it should be withdrawn until there has been sufficient consultation to ensure accuracy its comments to support strategy and that might assist it in reaching more equitable solutions to the need for more homes.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23389

Object

**Aylsham, 351****Respondent:** Mr Trevor Bennett [14599]**Summary:**

To suggest further development will support the strategic green network is worthy of 'Brave New World.' Future development takes away green space, it increases the carbon footprint and the amount of traffic in the area, without considering the increased strain on education and medical services. This is therefore not a sound policy.

**Change suggested by respondent:**

Further improvements to the green infrastructure would come with no new developments, but Reg.18 is a legal document and so there has to be one site, even though it will harm the green infrastructure. Reg.19 is not a legal document therefore it should be withdrawn to be followed by full consultation and then be re-written.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23390

Object

**Aylsham, 353****Respondent:** Mr Trevor Bennett [14599]**Summary:**

There is obviously a need to increase the water supply for Aylsham and the waste water disposal because it is not coping now. It is unsound to consider any further development until this has been achieved, if it is possible. Only two years ago it was stated by the Environment Agency that Aylsham should not have further development due to problems over water issues. To consider two sites is foolish, as well as unsound and will create major issues for the environment.

**Change suggested by respondent:**

Withdraw Re.19. it needs consultation and to be re-written.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23391

Object

**Policy 5 Homes, 271****Respondent:** Mr Trevor Bennett [14599]**Summary:**

Given that the main need for housing in the Greater Norwich area is affordable housing the strategy should insist that all developments provide a minimum of 33% affordable housing. There is an increased demand for private housing, but this is not a need, other than for people wanting to migrate to the area and for developers to improve their business.

**Change suggested by respondent:**

The need for more affordable housing should also include more social housing, this is particularly needed in Broadland where private housing is being used for renting at high rates, due to the fall in the number of local authority run properties.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23394

Object

**Housing, 51****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The problem is with your evidence, there is little understanding shown on the potential changes in population, the economic prediction lack clarity and there has been little consideration of the likely impact of Covid and Brexit. A rose tinted view of the economy is not likely to be met in practise and to determine housing policies on the evidence you have shown is going to be problematic for the area. In these respects the strategy is unsound.

**Change suggested by respondent:**

Take a wider look at economic forecasts and as in so much of the Plan put it out to consultation to gain a better understanding of how the local economy will be likely to operate in the next 15 years.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23395

Object

**Housing, 56****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This policy is unsound in that it assumes that the present policy is appropriate for the areas outside of Norwich. In recent years there has been an increase in privately rented properties with people buying houses for let at rates well above socially rented housing. This has created social and community problems.

**Change suggested by respondent:**

There needs to be more social rented properties in Broadland and South Norfolk

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23396

Object

**Education and Social Mobility, 75****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The County Council needs to be providing the schools that are needed for the communities. If they are only responding to new developments and waiting for houses to be completed there will always be over-crowding in schools.

**Change suggested by respondent:**

Aylsham needs a new primary school now, not when a development is completed. By linking infrastructure improvements to developments they always arrive to meet the need before the development not what is needed after the further increase in population. There needs to be a radical re-assessment of the provision of schools.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None



23451

Object

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**Environment, 150****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This strategy is unsound and not legally compliant as there is no evidence to support the statement, when the reality is the Plan is likely to increase greenhouse omissions.

**Change suggested by respondent:**

Reg.19 should be withdrawn due its failure to support statements with evidence and produce policies that will increase greenhouse omissions.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23440

Object

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**Homes, 134****Respondent:** Mr Trevor Bennett [14599]**Summary:**

I would question the accuracy and therefore soundness of the comment "our plan envisages the right number of homes". The number of homes is not sound due to the lack of consultation, the questionable understanding of population predictions, the awareness of economic developments and the need to increase the supply of homes to meet the demands of large scale developers to maximise their profits. There is confusion in regard to the term need and demand.

**Change suggested by respondent:**

Reg.19 should be withdrawn to undertake full consultation to establish a more coherent response to the needs of the Greater Norwich area.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23448

Object

**Communities, 132****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This strategy does not apply to the market towns of the Greater Norwich area or even the villages that are supported by these towns. By significantly increasing the numbers of new homes in the market towns it will mean that people will struggle to have good access to services and facilities" due to the large increase in the population, without commensurate increase in the infrastructure needed to meet the need. The strategy is not sound when put alongside the increase in new homes from Reg.18 to Reg.19. and the resultant increase in car use.

**Change suggested by respondent:**

Reg.19 should be withdrawn for proper consultation and and a more appropriate and thoughtful examination of the need for new homes. By increasing the number of new homes in Aylsham by 83% from Reg.18 the aims of this strategy cannot be met, therefore either the strategy needs to change to stating that services will decline, there will be an increase in the use of cars and more environmental pollution or the amount of new homes should be reduced.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23449

Object

**Environment, 146****Respondent:** Mr Trevor Bennett [14599]**Summary:**

This strategy, like so many of the ideas put forward is in conflict with the plan for over 49000 new homes, many of them in areas that mean the only method of transport available to reach the places of employment is by car. Because of the significant increase planned for new homes it is probable that air quality, particularly near Norwich will decline as more people will be driving into the city for work, therefore the policy is unsound as it conflicts with the policy of 49000 new homes.

**Change suggested by respondent:**

Withdraw Reg.19 for proper consultation with all the Town and Parish Councils.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23450

Object

**Environment, 147****Respondent:** Mr Trevor Bennett [14599]**Summary:**

As with nearly every strategy this conflicts with the strategy of the building of 49000 new homes. In respect of Aylsham to increase the number of new homes by 83% from Reg.18 to Reg.19 it will be impossible "to protect and enhance the distinctive characteristics of our towns". Given the experience of the last few years of developments the new homes will not be well designed and beautiful. This strategy is unsound as it does not support earlier strategies determining the amount of house building.

**Change suggested by respondent:**

Reg.19 should be withdrawn to enable full consultation with the town and parish councils. It does need to be emphasised that there has been no consultation concerning Reg.19.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23452

Object

**Delivery, Delivery Statement****Respondent:** Mr Trevor Bennett [14599]**Summary:**

I support the comments of Hugh Ivins, but wish to add that the document is not legally compliant due to the lack of consultation on changes to the number of homes from Reg.18 to Reg.19. In addition I believe that to consider work with the private sector to overcome constraints to planning is an insult to all who live and work in the community, including all town and parish councils. To consider that developers should be worked with and not local organisations makes the strategy unsound and unethical.

**Change suggested by respondent:**

Reg.19 should be withdrawn for full consultation with town and parish councils.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23493

Object

**Aylsham, 352****Respondent:** Mr Trevor Bennett [14599]**Summary:**

I find it strange that it is thought that 550 new homes, will lead to the "continued vitality of Aylsham." The reality is that the 15% to 20% increase in population with 15.6% increase in new homes will create significant problems for a town that so recently has had a similar increase with little improvements in the infrastructure. Reg.18 said there would be one site and there was some semblance of consultation, this increase of 83% more new homes above Reg.18 is without consultation. This means that this strategy is unsound.

**Change suggested by respondent:**

The points on strategy for Aylsham indicate a lack of knowledge of the town as well as lack of consultation. Therefore Reg.19 should be withdrawn for consultation, partly to ensure that the people involved in the publication understand the town they are both commenting on and deciding the amount of new homes a town is to have.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23494

Object

**Aylsham, 350****Respondent:** Mr Trevor Bennett [14599]**Summary:**

Though the Town Council have sent in objections to the plans for Aylsham, we were not sure at that time of the views of Highways on the potential developments. We have now heard that they are amazed that the GNLP could be considering putting a school in Burgh Road near the roundabout. This indicates that not only have the GNLP not consulted with the Town Council, they have even failed to properly consult Highways. This ensures that Reg.19 is both unsound and not legally compliant.

**Change suggested by respondent:**

Withdraw Reg.19 on grounds of not legally compliant and unsound on failure to consult fully with the stakeholders i.e. residents, Town Council and Highways and not just developers.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23537

Object

**Policy 7.2 The Main Towns, 346****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The statement that towns are "enabled to grow at appropriate scales," is obviously subjective, but it is difficult to argue that an increase in Aylsham of 83% in new homes from Reg.18 to Reg.19 is sound. The increase of new homes in Aylsham is a higher percentage than that for Norwich or the overall percentage for the main towns. This will mean that infrastructure problems will emphasise the failure of this policy as will the environmental damage that will occur.

**Change suggested by respondent:**

Reg.19 should be withdrawn to enable full consultation with local parish councils and town councils.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23560

Object

**Housing Growth Needs, 178****Respondent:** Mr Trevor Bennett [14599]**Summary:**

The statement points out that the buffer is greater than was needed, however there is not logical justification as to why this decision was taken. The impact on the area of this scale of building will create many problems. The lack of an analytical cost benefit analysis makes this policy unsound.

**Change suggested by respondent:**

There needs to be a full cost benefit analysis of the impact of building over 49000 new homes in the Greater Norwich Local area, until this is undertaken with full consultation Reg. 19 should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23561

Object

**The GNLP and other local plan documents, 26****Respondent:** Mr Trevor Bennett [14599]**Summary:**

I fully support the points raised in the CPRE report, with its detailed analysis of the importance of concentrating on the green agenda and highlighting how the Government White Paper will be subject to change.

**Change suggested by respondent:**

The response from the CPRE highlights why Reg. 19 should be withdrawn on a failure of soundness. It emphasises why there needs to be full consultation and a more thoughtful and analytical approach to any further development

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23616

Object

**Aylsham, 4.3****Respondent:** Mr Trevor Bennett [14599]**Summary:**

Aylsham Neighbourhood Plan is an important document that can help direct any developments to ensure the individuality and historical importance of the Town. Unfortunately the two recent developments have put undue strain on these aspects of the Town and by putting forward, without consultation, two further sites Reg.19 will fail to meet the objectives it puts forward in 4.3. It is impossible to protect the unique character and sense of community by building a further 550 houses. Therefore policies 4.3 and 4.4 are in conflict.

**Change suggested by respondent:**

Reg.19 should be withdrawn for full consultation with town and parish councils, local district councillors and residents of the area.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23478

Object

**Aylsham, 4.5****Respondent:** Jan Benson [19885]

**Summary:**

I am writing to raise concerns about the plan in specific relation to the housing plan for Aylsham.

In regard to Legal Compliance:

- I am not sure the process for community involvement has been in accordance with the LPA's Statement of Community Involvement: we were advised last year, in this plan, that an allocation of 300 houses would be scheduled for Aylsham. This has now increased to 550 without consultation. Should the Sustainability Appraisal Report be updated to reflect this increase of 83%?

Section 33A of PCPA requires the LPA to engage "constructively with the neighbouring authorities and certain other bodies over strategic matters". Given this huge increase, and the consequential impact on the environmental, economic and social objectives of this town, the town council should have been consulted about the change, but this has not been the case.

In regard to Soundness: I don't think the plan for Aylsham meets the criteria of:

- Justified: to over plan for 22% more than identified, without adequate justification, isn't good planning at all – it's a random figure based on a planner's musings one afternoon! The increase of 83% allocation of housing simply isn't validated at all.

In my view, the site chosen is poor because of the impact on Burgh Road (in both directions), which is already experiencing severe constraints since Bure Meadows was built. Even AYL4 would be better. But a more reasonable alternative would be the site you identify on the Norwich Road, which is a 'brownfield' site of an old hotel and – most importantly – on a good dual road with good access to the A140. I suspect it also has some accessible utilities, such as water and sewerage, because of the defunct hotel on the site. And the site is a current eyesore for the town.

- Effective: I don't believe your 'joint working' on cross-boundary strategic matters has been actioned at all, at a local level. The impact of this increase on all the town's infrastructure should be detailed: schools, roads, town parking, surgeries etc.

- And to another point, the continued development of poor quality, mass-designed housing allocation around the town does you no favours in checking the 'positively prepared' criterion. Aylsham is an historic market town: why not take some time and care to design good quality housing in keeping with the town's heritage? This was achieved in the redevelopment of St. Michael's Hospital, with less dense housing reflecting the design of the former hospital, and good use of space. It seems you have defaulted to the lowest common denominator of bland, dense, identical housing across the county – is this the best you can do? No, if you reduce the increase back to the agreed number, you can afford to be sensible planners with concerns for the objectives you say you account for, above.

I have suggestions for improvement on both these criteria but I think you would be better served by having a proper consultation with the town council, so that my suggestions can be taken into consideration with other residents, who live here and care for our town.

Sorry to sound so critical – but you can do better, and we can help you!

**Change suggested by respondent:**

I am writing to raise concerns about the plan in specific relation to the housing plan for Aylsham.

In regard to Legal Compliance:

- I am not sure the process for community involvement has been in accordance with the LPA's Statement of Community Involvement: we were advised last year, in this plan, that an allocation of 300 houses would be scheduled for Aylsham. This has now increased to 550 without consultation. Should the Sustainability Appraisal Report be updated to reflect this increase of 83%?

Section 33A of PCPA requires the LPA to engage "constructively with the neighbouring authorities and certain other bodies over strategic matters". Given this huge increase, and the consequential impact on the environmental, economic and social objectives of this town, the town council should have been consulted about the change, but this has not been the case.

In regard to Soundness: I don't think the plan for Aylsham meets the criteria of:

- Justified: to over plan for 22% more than identified, without adequate justification, isn't good planning at all – it's a random figure based on a planner's musings one afternoon! The increase of 83% allocation of housing simply isn't validated at all.

In my view, the site chosen is poor because of the impact on Burgh Road (in both directions), which is already experiencing severe constraints since Bure Meadows was built. Even AYL4 would be better. But a more reasonable alternative would be the site you identify on the Norwich Road, which is a 'brownfield' site of an old hotel and – most importantly – on a good dual road with good access to the A140. I suspect it also has some accessible utilities, such as water and sewerage, because of the defunct hotel on the site. And the site is a current eyesore for the town.

- Effective: I don't believe your 'joint working' on cross-boundary strategic matters has been actioned at all, at a local level. The impact of this increase on all the town's infrastructure should be detailed: schools, roads, town parking, surgeries etc.

- And to another point, the continued development of poor quality, mass-designed housing allocation around the town does you no favours in checking the 'positively prepared' criterion. Aylsham is an historic market town: why not take some time and care to design good quality housing in keeping with the town's heritage? This was achieved in the redevelopment of St. Michael's Hospital, with less dense housing reflecting the design of the former hospital, and good use of space. It seems you have defaulted to the lowest common denominator of bland, dense, identical housing across the county – is this the best you can do? No, if you reduce the increase back to the agreed number, you can afford to be sensible planners with concerns for the objectives you say you account for, above.

I have suggestions for improvement on both these criteria but I think you would be better served by having a proper consultation with the town council, so that my suggestions can be taken into consideration with other residents, who live here and care for our town.

Sorry to sound so critical – but you can do better, and we can help you!

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



24376

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Berliet Limited [20069]**Agent:** Quantum Land (Hannah Leary) [18595]**Summary:**

Policy 5 – Homes –we welcome the acknowledgement that high costs can have an impact on viability, and the adjustment to this Policy at 'Affordable Housing, 1st bullet, (b)' for brownfield sites. However, it is our view that this approach should not be restricted solely to brownfield sites. All sites within the Norwich Urban Area and Fringe will by their urban nature be constrained and will face the same challenges as City centre sites, and it is our view that the same flexible approach should be applied to those sites, with the lower 28% threshold being applied. As acknowledged by the proposed amendment to the Policy, this would need to be supported by viability evidence;

**Change suggested by respondent:**

See attachment

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** 23847 A3 HL 21 03 22 Letter to GNLP Reg 19 - FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4wy>

24377

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Berliet Limited [20069]**Agent:** Quantum Land (Hannah Leary) [18595]**Summary:**

Policy 7.1 – The Norwich Urban Area including the fringe parishes – we continue to object to this policy on the grounds that there are no new allocations, including those proposed at GNLP2170 and GNLP2171, within the Thorpe St Andrew area. These sites were considered to be reasonable alternatives within the HELAA and are sustainable urban previously developed sites. There is no evidence to support the development of these sites as resulting in a loss of playing pitches, and the presence of Ancient Woodland is not considered to be a barrier to their development, rather an asset to be managed and protected within a redevelopment scheme.

**Change suggested by respondent:**

See Attachment.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** 23847 A3 HL 21 03 22 Letter to GNLP Reg 19 - FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4wy>

24357

Object

## Policy 7.4 Village Clusters, Policy 7.4 Village Clusters

**Respondent:** H Berney [20063]

**Agent:** Mrs Nicole Wright [14312]

### Summary:

Submitted on behalf of landowner

Policy 7.4 - Village Clusters is not positively prepared justified, compliant with national policy or effective as it fails to take account of the need to prioritise brownfield sites for provision of new homes and employment. Apart from on the allocated sites, new homes and businesses would be limited to infill within settlement boundaries or affordable housing led development. No consideration is given to established /brownfield sites that are suitable and available for redevelopment. The development of such sites could help to make more efficient use of land and better serve the needs of local communities. Additionally, they provide an excellent opportunity for regeneration and building back better, getting rid of ugly and deteriorating landscapes, enhancing biodiversity and improving drainage infrastructure.

Similarly, the policy does not address the need for enhancing the environment and improving the sustainability of existing rural businesses that may exist outside settlement limits.

The NPPF states in paragraph 78 that "housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." The GNLP does not propose a policy that supports this, instead through proposing an allocation only approach, and exceptionally limited windfall proposals through policy 7.5 the GNLP directly restricts growth of local rural economies in a manner inconsistent with the NPPF. The local rural economies require new development and new residents, to thrive. The Draft GNLP does not identify opportunities or provide a significant policy to support village and rural community growth in a meaningful manner, instead it actively restricts this, in conflict with paragraph 78 of the NPPF. Consequently, it is not consistent with national policy and is in conflict with paragraph 35 of the NPPF.

Furthermore, policy 7.5 is not positively prepared or justified as it does not take account of the disparate characteristics of the 'smaller parishes' and 'larger parishes' within the GNLP area. Within some of the larger parishes it is clear that there are highly sustainable settlements where in excess of 9 dwellings could be accommodated sustainably.

The recently published Building Better, Building Beautiful Commission "Living with Beauty" report and the Government's Design Code Template encourages development that respond to local area characteristics, which does not restrict development to an arbitrary number of units.

### Change suggested by respondent:

Policy 7.4 - Given the spatial portrait (place setting), it is essential that this policy is modified to take account of brownfield and other potentially suitable development sites that may not be located within or adjacent to settlement limits. these sites could address the needs of our rural communities and businesses in accordance with paragraph 84 of the National Planning Policy Framework.

Policy 7.5 should be modified to take account of the context of the site and the sustainability of the location permitting more that 5 dwellings if the location is sustainable and the site is well-related to the settlement. For example, in an accessible location like the Norwich urban fringe and/or accessible and desirable locations such as Bracon Ash and Mulbarton.

There should be reference made to the importance of local standards of beauty, quality, and design, under the new rules which came into effect on 30 January 2021 under the national model design code and any local design codes which might be in place.

**Legally** Yes  
**compliant:**  
**Sound:** No

Comply with Yes  
duty:

Appear exam: Written Representation

Attachments: None

24358

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

Respondent: H Berney [20063]

Agent: Mrs Nicole Wright [14312]

### Summary:

Policy 7.4 - Village Clusters is not positively prepared justified, compliant with national policy or effective as it fails to take account of the need to prioritise brownfield sites for provision of new homes and employment. Apart from on the allocated sites, new homes and businesses would be limited to infill within settlement boundaries or affordable housing led development. No consideration is given to established /brownfield sites that are suitable and available for redevelopment. The development of such sites could help to make more efficient use of land and better serve the needs of local communities. Additionally, they provide an excellent opportunity for regeneration and building back better, getting rid of ugly and deteriorating landscapes, enhancing biodiversity and improving drainage infrastructure.

Similarly, the policy does not address the need for enhancing the environment and improving the sustainability of existing rural businesses that may exist outside settlement limits.

The NPPF states in paragraph 78 that "housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." The GNLP does not propose a policy that supports this, instead through proposing an allocation only approach, and exceptionally limited windfall proposals through policy 7.5 the GNLP directly restricts growth of local rural economies in a manner inconsistent with the NPPF. The local rural economies require new development and new residents, to thrive. The Draft GNLP does not identify opportunities or provide a significant policy to support village and rural community growth in a meaningful manner, instead it actively restricts this, in conflict with paragraph 78 of the NPPF. Consequently, it is not consistent with national policy and is in conflict with paragraph 35 of the NPPF.

Furthermore, policy 7.5 is not positively prepared or justified as it does not take account of the disparate characteristics of the 'smaller parishes' and 'larger parishes' within the GNLP area. Within some of the larger parishes it is clear that there are highly sustainable settlements where in excess of 9 dwellings could be accommodated sustainably.

The recently published Building Better, Building Beautiful Commission "Living with Beauty" report and the Government's Design Code Template encourages development that respond to local area characteristics, which does not restrict development to an arbitrary number of units.

**Change suggested by respondent:**

Policy 7.4 - Given the spatial portrait (place setting), it is essential that this policy is modified to take account of brownfield and other potentially suitable development sites that may not be located within or adjacent to settlement limits. these sites could address the needs of our rural communities and businesses in accordance with paragraph 84 of the National Planning Policy Framework.

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There should be reference made to the importance of local standards of beauty, quality, and design, under the new rules which came into effect on 30 January 2021 under the national model design code and any local design codes which might be in place.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23296

Object

**Aylsham, 4.5**

**Respondent:** Ms Maggie Bewley [19797]

**Summary:**

779 homes need supporting facilities. One new primary school is planned. What are the plans for secondary schooling? Health provision? Car parking? There is inclusion of a care unit/ housing but there is a need for affordable bungalows for the older population ( of which I am one) before they reach the need for care. There are no such homes on either Bure Meadow or Woodgate Farm estates. It appears this tranche of the resident population is continually being ignored in the interest of maximising profit. ( I can think of no other reason.)

**Change suggested by respondent:**

To see a clear plan for the provision of health care . The present surgeries are already overwhelmed.

The clear planning for secondary education facilities.

The allocation of new car parking to support the businesses in the town and reduce the chaotic Street parking which has increased following completion of Woodgate Farm and Bure Meadow.

The inclusion of affordable bungalows for retirement in the planning

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24233

Object

## CC16, CC16 Policy

**Respondent:** Bidwells (Mr Iain Hill, Partner) [16273]

**Petition:** 2 petitioners

### Summary:

Bidwells continue to strongly support the allocation of land adjoining Norwich City Football Club for mixed use development. The site is entirely deliverable, and capable of making a significant contribution towards the need for additional leisure, community, residential, retail and office uses in the Greater Norwich Area during the period to 2038. The site occupies a highly sustainable location within Norwich City Centre due to its proximity to a range of services and amenities and sustainable modes of transport, notably Norwich Railway Station

The site has, and continues to, make a significant contribution towards housing delivery in the Greater Norwich area. As detailed in the draft policy's supporting text, the Carrow Quay and Carrow View developments which will provide a total of 323 units, are being implemented by Broadland Housing, with some units already occupied. These developments have already delivered a number of the objectives of the Policy CC16.

The wider allocation has the potential to be developed to provide a range of uses, which as well as residential could include a multi-purpose Arena, that could be used for, amongst other things, sport, music and conferencing; helping to achieve a sustainable mixed use development.

See Attachment.

### Change suggested by respondent:

Changes Sought

However, whilst the allocation of land adjoining Norwich City Football Club is generally considered sound based on the tests of soundness set out in paragraph 35 of the NPPF, minor alterations to the wording of Policy GNLP0520 are considered necessary.

The policy states that a minimum of 270 homes will be accommodated on the site. However, it is not clear as to whether this figure includes committed developments that are being constructed, or specifically refers to new homes. In our view, it should be the latter.

The only parts of the allocation that are not in the process of being developed are surface car parks, which paragraph 2.192 recognises is an inefficient use of the site. Accordingly, the policy's supporting text should make it clear that these areas will be the focus of the proposed mixed-use development, including high density housing.

Initial design work has demonstrated that the surface car parking areas have the capacity to accommodate 200 units, having regard to various site opportunities and constraints. Accordingly, to ensure that the development potential of the site is maximised through the efficient use of land, the policy should state that the site will accommodate at approximately 200 homes. This approach and the one detailed in the preceding policy will ensure that the policy is justified, consistent with national policy and, therefore, sound.

In addition, the policy should be reviewed to outline which aspects have already been already and, therefore, are not relevant to the remaining undeveloped part of the site. For example, the developments under construction have enhanced the river frontage; improvements which cannot be delivered by the development of the surface car parkd.

The site has the potential to help facilitate the regeneration of the East Norwich area by ensuring that any development on the site does not prejudice the ability to ensure future connectivity, most notably through pedestrian and public transport links, in the future. However, whilst future connectivity with the East

Norwich area is a key objective, the development of the site, which may be developed in phases, is not dependent on the regeneration of the wider area, as is demonstrated by the above referenced developments; a fact that should be specifically mentioned in either the policy or supporting text in order to provide certainty. Failure to do this will potentially result in the policy being unsound on the basis it does not provide an appropriate strategy.

As drafted, the policy requires that any development provides a public transport interchange on site, together with a public transport strategy for the wider east Norwich strategic regeneration area. As detailed above, the site occupies a highly sustainable location and significant improvements have been made to public transport accessibility in recent years, principally the inclusion of a bus stop on Canary Fields and a bus gate between Geoffrey Watling Way and Koblenz Avenue. Accordingly, whilst it is acknowledged that any development will need to demonstrate how it will connect and be accessible by public transport, the requirement to provide a public transport interchange is not justified and is considered unnecessary. No information has been required on what is required to deliver a public transport interchange on the site. Therefore, it has not been possible to assess the implications for the viability of any development on the site of this requirement.

The policy also states that any proposal will be required to provide a public transport strategy for the wider east Norwich strategic regeneration area. As detailed above, whilst the redevelopment of the Norwich East area is supported, its delivery is completely independent from the development of the land covered by Policy CC16. In addition, given the strategic nature of the Norwich East area, the public transport improvements for this area are likely to be significantly greater than those required on land immediately to the east of Norwich City Football Club. Therefore, whilst it is recognised that any proposal must demonstrate how it would facilitate future links with the wider Norwich East area, the requirement to provide a public transport strategy for the wider Norwich East areas as part of the development of Policy CC16 would be both unreasonable and disproportionate.

Accordingly, it is proposed that in order to ensure the proposed policy is justified and, therefore, sound that reference to both a public transport interchange on site and a public transport strategy for the wider Norwich East area is removed.

See attachment for revised policy wording.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLP - CC16 Final.pdf - <https://oc2connect.gnlp.org.uk/a/4bq>

23257

Support

**Taverham, Settlement Map****Respondent:** Mrs Mary Bishop [17062]**Summary:**

I wish to support the legal compliance and soundness of the Local Plan, and its compliance with the duty to co-operate.

I fully support the rejection of site GNLP4040 and commend the Planning Officers on their decision to protect the Wensum Valley in Taverham and conserve the peaceful and currently undisturbed amenity this provides to the residents of Taverham and the surrounding villages.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24359

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** A Bond [20062]**Agent:** Mrs Nicole Wright [14312]**Petition:** 2 petitioners**Summary:**

Submitted on behalf of landowner

Policy 7.4 - Village Clusters

This policy is not positively prepared justified or compliant with national policy. It is not effective. It does not address the need to prioritise brownfield sites ahead of greenfield for provision of new homes. The policy needs to be broadened to consider the provision of new homes on brownfield sites that may be within a hamlet but situated to meet the needs of our rural communities. The regeneration of such sites, especially where supported by local parish councils, could have a huge impact on making the countryside more beautiful in line with new national policy. It would also help to reduce carbon emissions enabling families to remain in villages where they have long established links.

Although this policy is welcomed and supported, it needs to provide more detail of the criteria for assessment under the policy. It is not effective without this.

**Change suggested by respondent:****Policy 7.4**

The policy should take account of brownfield and other potentially suitable development sites that may not be located within or adjacent to settlement limits taking heed of paragraph 84 of the National Planning Policy Framework.

**Policy 7.5**

Criteria for assessment to be added. For instance, brownfield sites being prioritised.

There should be reference made to the importance of local standards of beauty, quality and design under the new rules which came into effect on 30 January 2021, the national model design code and any local design codes which might be in place.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



24360

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** A Bond [20062]

**Agent:** Mrs Nicole Wright [14312]

**Petition:** 2 petitioners

### Summary:

Policy 7.4 - Village Clusters

This policy is not positively prepared justified or compliant with national policy. It is not effective. It does not address the need to prioritise brownfield sites ahead of greenfield for provision of new homes. The policy needs to be broadened to consider the provision of new homes on brownfield sites that may be within a hamlet but situated to meet the needs of our rural communities. The regeneration of such sites, especially where supported by local parish councils, could have a huge impact on making the countryside more beautiful in line with new national policy. It would also help to reduce carbon emissions enabling families to remain in villages where they have long established links.

Although this policy is welcomed and supported, it needs to provide more detail of the criteria for assessment under the policy. It is not effective without this.

### Change suggested by respondent:

Policy 7.4

The policy should take account of brownfield and other potentially suitable development sites that may not be located within or adjacent to settlement limits taking heed of paragraph 84 of the National Planning Policy Framework.

Policy 7.5

Criteria for assessment to be added. For instance, brownfield sites being prioritised.

There should be reference made to the importance of local standards of beauty, quality and design under the new rules which came into effect on 30 January 2021, the national model design code and any local design codes which might be in place.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23258

Object

## Site Assessment Booklets and Studies, Sustainability Appraisal Report

**Respondent:** Mr Clive Boyd [19226]

**Summary:****Sustainability Appraisal**

The Sustainability Appraisal is flawed in its assessment of reasonable alternatives, environmental objectives, and social objectives.

**Reasonable Alternatives**

Many of the local residents chose their homes because of their location. Repeatedly, local authority told us that the field designated as Site No GNLP0463R was outside the building line, and that any future development would take place in the field immediately to the south of Big Back Lane, with access via Beauchamp Road and Proctor Road. Indeed, the ends of these two roads have been left open whereby they could be extended to service any new development. We feel betrayed that the traditional building line is being ignored, as is the original proposed site for development.

**Environmental**

The proposed development and possible widening of local roads will severely impact on this beautiful area in an adverse way. The villagers are aghast at its potential loss which would hardly engender good feeling towards the new estate. It would be a mistake to tally the residents of Chedgrave without taking into account Langley School, situated on the edge of the village. The capacity of the schools is for over 800 persons; teachers, pupils, and support staff; this compares with just over 1,000 residents of Chedgrave. The daily movement of personnel connected to the school already makes the volume of traffic an issue in the area, which would

be exacerbated by the proposed development.

**Social**

The local facilities to service the new development are already fully utilised, with little capacity to accommodate more residents, especially when it is also proposed to have an even bigger development (GNLP0312) in this same area.

The Sustainability Appraisal is jaundiced in that it concentrates on the requirements of the new residents without giving consideration to the impact on the current residents. We cannot find a single resident who is in favour of this development, and are struggling to understand why it is being foisted upon us against our wishes. We cannot believe that our green habitat needs to be taken before the GNLP can achieve its building targets.

**Change suggested by respondent:****Sustainability Appraisal**

The Sustainability Appraisal is flawed in its assessment of reasonable alternatives, environmental objectives, and social objectives.

**Reasonable Alternatives**

Many of the local residents chose their homes because of their location. Repeatedly, local authority told us that the field designated as Site No GNLP0463R was outside the building line, and that any future development would take place in the field immediately to the south of Big Back Lane, with access via Beauchamp Road and Proctor Road. Indeed, the ends of these two roads have been left open whereby they could be extended to service any new development. We feel betrayed that the traditional building line is being ignored, as is the original proposed site for development.

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**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23936

Object

**Blofield, Settlement Map****Respondent:** Braydestone Farms Ltd [20041]**Agent:** Mr Magnus Magnusson [14502]**Petition:** 2 petitioners**Summary:**

Please find details in the accompanying Reg. 19 Consultation Response Statement. My client's site ought to be included in the GNLP as an allocation. At the very least, my client's site ought to have been considered as a 'reasonable' alternative and assessed as such within the context of the SA/SEA processes as it is demonstrably 'suitable' as evidenced via the HELAA.

**Change suggested by respondent:**

Inclusion of site GNLP4013 within the GNLP as an allocation. Please see accompanying Reg. 19 Consultation Statement for further information.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Reponse - Blofield - <https://oc2connect.gnlp.org.uk/a/475>

23937

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Braydestone Farms Ltd [20041]**Agent:** Mr Magnus Magnusson [14502]**Petition:** 2 petitioners**Summary:**

Please find details in the accompanying Reg. 19 Consultation Response Statement. My client's site ought to be included in the GNLP as an allocation. At the very least, my client's site ought to have been considered as a 'reasonable' alternative and assessed as such within the context of the SA/SEA processes as it is demonstrably 'suitable' as evidenced via the HELAA.

**Change suggested by respondent:**

Inclusion of site GNLP4013 within the GNLP as an allocation. Please see accompanying Reg. 19 Consultation Statement for further information.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Reponse - Blofield - <https://oc2connect.gnlp.org.uk/a/475>

24111

Object

**Policy 0125R, 0125R Policy**

**Respondent:** Bright Futures Developments St Faiths Ltd [19521]

**Agent:** Mr Jon Jennings [19303]

**Petition:** 2 petitioners

### Summary:

In relation to the allocation Policy GNL0125R Land to the west of West Lane, Horsham St Faith there are clear inconsistencies between the comments made in the supporting text to Policy GNL0125R that "More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints" and Paragraph 6.70 of the plan which states that "It is considered that as well as existing allocations and windfall development, approximately 20-50 new homes are appropriate for the Horsham St Faith cluster. Horsham St Faith and Newton St Faith contains a range of services including a primary school, village hall, food shop and public transport". No justification has been made as to how and why this allocation has been increased from 20-30 dwellings in the Regulation 18 plan to 50+ in the current consultation, especially in view of the comments made at paragraph 6.70.

The proposed allocation represents part of an existing agricultural field and has no defensible boundaries and will represent an uncontrolled expansion into the open countryside. The accompanying text to Policy GNL0125R surprisingly includes no commentary regarding the need to provide landscaping to soften the impact of the proposal and prevent unrestricted encroachment into the open countryside. This is of particular importance as the site has been promoted on the basis of circa 400 dwellings. The approach being taken by the Council will open this site up to future expansion. As a consequence of the landscape impacts this should score amber in the Stage 2 HELAA comparison table.

There are also other sites submitted via the Regulation 18 call for sites that could provide circa 30 dwellings which would have less impact on both the townscape and landscape, for example GNL01054 which represents infill development, within an otherwise built-up frontage and defensible boundaries.

The GNL0125R site is also immediately adjacent to an industrial estate and no issues have been raised with regards to noise and nuisance and the impact that new housing could potentially have on the operation of the existing and extended industrial estate. The potential adverse impacts on amenity are confirmed by Policy SL2007/GNL0406/HNF3 which is proposing a 4.39ha allocation for B2 and B8 uses. There is scant evidence that the impact of this B2/B8 allocation has been considered in the allocation of GNL0125R. It is apparent that this allocation is also contrary to the advice contained at paragraph 182 of the National Planning Policy Framework. Whilst this aspect of the allocation scores amber on the HELAA table it is contended that this should score red.

The potential impacts on a Grade 1 Listed Church, the scheduled monument St Faith Priory and the Conservation Area are noted. However, these are not considered by the Council to be an impediment to development. This is rather a perverse view when sites with a less harmful relationship have been rejected, for example GNL01054. Due to the concerns raised it is questioned as to whether this aspect should have scored red in the Stage 2 – HELAA Comparison Table.

The assessment regarding Transport & Roads is also perverse with this being assessed as green. The accompanying text to Policy GNL0125R states that "the scheme will need to provide frontage footways, carriageway widening, implementation of improvements required to the walking to school route including junctions on route and the provision of two vehicular accesses" The HELAA Conclusion also states that "subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated". The level of works required is considerable and the Transport and Road impacts should be amber.

The requirement for two accesses also raises queries as to the actual scale of development which will eventually be provided with circa 125 dwellings being able to be provided from a single access point and no justification or evidence has been provided as to why two points of vehicular access are required. The two access points appears to have stemmed from the initial proposal for 400 dwellings and shows that the policy has not been reviewed to reflect the reduced scale of development.

In view of the above there are questions as to whether the plan has been positively prepared. There are also questions as to the robustness of the assessment given to this site.

**Change suggested by respondent:**

As a result of the above it is not considered that this part of the plan is sound. The plan does not appear to have properly considered reasonable alternatives and there are inconsistencies in the evidence as with regards to the scale of development actually being considered and the failure to reconsider the access requirements based on a reduced scale of development.

The proposal has failed to assess the impact of the development on the landscape setting of Horsham St Faith and has failed to consider the significant amenity issues associated with locating a site immediately opposite an existing B1 and B2 Industrial Estate which is proposed for significant expansion. The proposal is also clearly no consistent with the advice contained at Paragraph 182 of the National Planning Policy Framework.

If the plan is to be made sound the proposed site allocation should be properly assessed having full regard to the issues raised in Section 5.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

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**24112****Object****Horsham St Faith, Settlement Map**

**Respondent:** Bright Futures Developments St Faiths Ltd [19521]

**Agent:** Mr Jon Jennings [19303]

**Petition:** 2 petitioners

**Summary:**

These representations have been prepared in relation to the Council's assessment of the site GNLP1054 and will also include a comparison of this site with the site proposed for allocation GNLP0125R. These representations are also seeking to correct the inaccuracies in the assessment made by the Council, which despite being challenged in the Regulation 18 consultation and assessment have been repeated.

In the case of GNLP1054 as detailed on the plan accompanying these representations it comprises infill development on an otherwise built-up frontage. This is assisted by allocation Policy HNF1: Land east of Manor Road having been subject to an approval of planning permission for 69 dwellings. Construction of this development has recently commenced. This site (HNF1) is also committed to providing significant improvements to the footpath network from this site southwards to the Primary School. It is apparent that the Council saw HNF1 as a sustainable site when allocating it and subsequently granting planning permission.

Unlike GNLP0125R the majority of the works for a safe walking route to school are already approved. This site is 1.4km from the school which is within walking distance and unlike the site GNLP0125R, whilst only being circa 900m from the school requires numerous junction/road crossings to access the school. Therefore, there are questions as whether a safe route to school can be created and the impact the provision of this route will have on the viability of a development of 50 houses.

The Council are incorrect in the comments that they have made regarding the appeal against non-determination (APP/K2610/W/19/3226697). This appeal was dismissed on the basis that the site would have an adverse impact on heritage assets rather than on landscape or access issues. In relation to access the Inspector at paragraph 13 of his decision letter stated that "Whilst there seems no doubt that occupiers of these dwellings would be subject to some additional activity from the use of the road, I do not feel that it would be significantly different to that which they already experience from their dwelling fronting a main road and being set not overly far back from a busy arterial A road". This is reinforced by paragraph 14 where it is stated that "With these factors in mind, I do not consider that the additional activity associated with the proposed development would, in context, give rise to an unacceptable impact on the living conditions of existing occupiers through noise disturbance". Paragraph 26 advises that "From the evidence provided by the Council, the appellant and consultees it seems that the appeal scheme would be acceptable in terms of highway safety and the living conditions of future occupiers as well as considering matters of ecology, biodiversity, trees and drainage acceptability.

Continued on attachment.

**Change suggested by respondent:**

The rejection of the site GNLP1054 has not been justified and the basis of rejecting the site is based on out-of-date information and incorrect assumptions. This site needs to be properly assessed and the scorings revised before a proper and impartial assessment is made with regards to Policy GNLP0125R and GNLP1054. Following this assessment detailed justification should be made as to why GNLP125R is considered the optimum site despite the constraints associated with the site.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Further info and Plan - <https://oc2connect.gnlp.org.uk/a/49k>

23343

Support

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- o The Built and Historic Environment – first bullet point – it states developers should be ‘undertaking a heritage impact assessment if significant impacts might arise’ – government guidance states that this is required for any application that affects any heritage asset or their setting – including locally identified heritage assets. Is the wording therefore needed and if so does it need re-wording?
- o Policy 3 second bullet point – ‘public benefits’ might be better wording than ‘benefits’. Should this be re-worded to put the emphasis on avoiding harm to Heritage assets?
- o Policy 3 - The Built and Historic Environment – last sentence states ‘importance of the heritage asset’, for the sake of consistency of terminology would ‘significance of the heritage asset’, as per the NPPF, be better?
- o Policy 3 – Natural Environment – first para – it states ‘ancient trees and woodland’ should be protected. Could this be broadened out to include other trees which contribute greatly to our settlements and green spaces?

**Change suggested by respondent:**

- o The Built and Historic Environment – first bullet point – it states developers should be ‘undertaking a heritage impact assessment if significant impacts might arise’ – government guidance states that this is required for any application that affects any heritage asset or their setting – including locally identified heritage assets. Is the wording therefore needed and if so does it need re-wording?
- o Policy 3 second bullet point – ‘public benefits’ might be better wording than ‘benefits’. Should this be re-worded to put the emphasis on avoiding harm to Heritage assets?
- o Policy 3 - The Built and Historic Environment – last sentence states ‘importance of the heritage asset’, for the sake of consistency of terminology would ‘significance of the heritage asset’, as per the NPPF, be better?
- o Policy 3 – Natural Environment – first para – it states ‘ancient trees and woodland’ should be protected. Could this be broadened out to include other trees which contribute greatly to our settlements and green spaces?

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None



23344

Support

## East Norwich, Map 9 Norwich City Centre, the Northern City Centre Strategic Growth Strategic Regeneration Area

**Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]

### Summary:

- The map on page 100 needs to show the part of the utilities site in the Broads. The preceding text talks about looking at the area as a whole, yet misses the bit of the Utilities Site that is in the Broads.

### Change suggested by respondent:

- The map on page 100 needs to show the part of the utilities site in the Broads. The preceding text talks about looking at the area as a whole, yet misses the bit of the Utilities Site that is in the Broads.

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23345

Support

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]

### Summary:

- Policy 7.1, page 105, there needs to be some acknowledgement in this policy, even if it is a footnote, to say that part of the Utilities site is in the Broads and that the entire area is being considered together, regardless of local planning authority administration boundaries.

### Change suggested by respondent:

- Policy 7.1, page 105, there needs to be some acknowledgement in this policy, even if it is a footnote, to say that part of the Utilities site is in the Broads and that the entire area is being considered together, regardless of local planning authority administration boundaries.

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23346

Support

## The Built and Historic Environment, 205

**Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]

### Summary:

- Para 205 – ‘The strategic approach to heritage is first to consider the potential location of development, for example does the location itself “fit” well in relation to adjoining settlements’. We are not entirely clear what this means. Does it mean that new development should relate well to its historic context?
- Para 205 - goes on to state that development should avoid intruding into important views of historic assets. Historic England guidance on the Setting of Historic assets (The Setting of Heritage Assets ([historicengland.org.uk](http://historicengland.org.uk))) and numerous appeal decisions make clear that the setting of a heritage asset is much greater than views and it is the setting of heritage assets that need to be considered not specific views.
- Para 205 - Also ‘historic assets’ is used – should the term be heritage assets to ensure it correlates with the terminology defined in the NPPF?

### Change suggested by respondent:

- Para 205 – ‘The strategic approach to heritage is first to consider the potential location of development, for example does the location itself “fit” well in relation to adjoining settlements’. We are not entirely clear what this means. Does it mean that new development should relate well to its historic context?
- Para 205 - goes on to state that development should avoid intruding into important views of historic assets. Historic England guidance on the Setting of Historic assets (The Setting of Heritage Assets ([historicengland.org.uk](http://historicengland.org.uk))) and numerous appeal decisions make clear that the setting of a heritage asset is much greater than views and it is the setting of heritage assets that need to be considered not specific views.
- Para 205 - Also ‘historic assets’ is used – should the term be heritage assets to ensure it correlates with the terminology defined in the NPPF?

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23348

Support

**The Built and Historic Environment, 207****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- Para 207 – should this state ‘public benefits’ not just benefits?
- Para 207 – This paragraph recognises that in certain circumstances a balance will need to be struck between development and protection and this recognition is useful. It might be helpful if this section was weighted more towards protection of the historic environment, taking a precautionary approach. The NPPF states that substantial harm to grade II listed HAs should be exceptional and to SAMs or grade II\* / grade I HAS should be wholly exceptional (para 194). Equally para 195 of the NPPF states applications should be refused where a proposal will lead to substantial harm unless there are substantial public benefits that outweigh that loss or all of 4 tests can be met.

**Change suggested by respondent:**

- Para 207 – should this state ‘public benefits’ not just benefits?
- Para 207 – This paragraph recognises that in certain circumstances a balance will need to be struck between development and protection and this recognition is useful. It might be helpful if this section was weighted more towards protection of the historic environment, taking a precautionary approach. The NPPF states that substantial harm to grade II listed HAs should be exceptional and to SAMs or grade II\* / grade I HAS should be wholly exceptional (para 194). Equally para 195 of the NPPF states applications should be refused where a proposal will lead to substantial harm unless there are substantial public benefits that outweigh that loss or all of 4 tests can be met.

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None

23349

Support

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

The reason for the following is not explained and is different to the NPPF. Depending on what is meant, it could affect the setting of the Broads. We would welcome some explanation around the wording used and also its justification.

• Policy 7.4, page 117 seems to imply that rural exception sites or entry level exception sites can be 'well related' to settlement boundaries. The NPPF says that such sites should be adjacent. Why is this approach being changed? It does not seem to be explained anywhere in the document. What is well related as well? How far from a settlement boundary can a development be? Depending on what is meant, this could affect the setting of the Broads and we may strengthen the status of our comment later in the examination process. Perhaps of relevance are the changes to the NPPF that are proposed to the current paragraph 172, proposed paragraph 175: 'The scale and extent of development within these designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes'.

**Change suggested by respondent:**

The reason for the following is not explained and is different to the NPPF. Depending on what is meant, it could affect the setting of the Broads. We would welcome some explanation around the wording used and also its justification.

• Policy 7.4, page 117 seems to imply that rural exception sites or entry level exception sites can be 'well related' to settlement boundaries. The NPPF says that such sites should be adjacent. Why is this approach being changed? It does not seem to be explained anywhere in the document. What is well related as well? How far from a settlement boundary can a development be? Depending on what is meant, this could affect the setting of the Broads and we may strengthen the status of our comment later in the examination process. Perhaps of relevance are the changes to the NPPF that are proposed to the current paragraph 172, proposed paragraph 175: 'The scale and extent of development within these designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes'.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23350

Support

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

The following points are not soundness issues, but the plan could easily be amended to include them. It seems logical to address these comments as additional modifications. They provide clarity and context and further useful information.

- Policy 2, bullet 5 – would welcome, perhaps in a footnote, reference to the landscape character assessment for the Broads, so it is clear that our LCA might be of relevance as well.

**Change suggested by respondent:**

The following points are not soundness issues, but the plan could easily be amended to include them. It seems logical to address these comments as additional modifications. They provide clarity and context and further useful information.

- Policy 2, bullet 5 – would welcome, perhaps in a footnote, reference to the landscape character assessment for the Broads, so it is clear that our LCA might be of relevance as well.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23351

Support

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

The following points are not soundness issues, but the plan could easily be amended to include them. It seems logical to address these comments as additional modifications. They provide clarity and context and further useful information.

- Policy 7.1, page 106, last bullet point – you might want to have a footnote that refers to the local plan for the Broads and our policies on navigation.

**Change suggested by respondent:**

The following points are not soundness issues, but the plan could easily be amended to include them. It seems logical to address these comments as additional modifications. They provide clarity and context and further useful information.

- Policy 7.1, page 106, last bullet point – you might want to have a footnote that refers to the local plan for the Broads and our policies on navigation.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23354

Support

**Renewable Energy, 103****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Minor comments

Minor points for you to consider. These could aid clarity. They could be additional modifications.

- 103 – should this also refer to off shore wind's on-shore infrastructure?

**Change suggested by respondent:**

Minor comments

Minor points for you to consider. These could aid clarity. They could be additional modifications.

- 103 – should this also refer to off shore wind's on-shore infrastructure?

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None

23355

Support

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Typo and grammatical errors

Typos and grammatical errors for you to consider

- Page 105: Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 9 including Carrow Works, the Deal Ground and the Utilities Site will create a highly sustainable mixed-use gateway quarter accommodating substantial housing growth and optimising economic benefits.

Development across the sites will provide in the region of 4,000 additional homes in the plan period and significant new employment opportunities for around 6,000 jobs. East Norwich also has the potential to act as a long-term catalyst for regeneration of the wider area, potentially including the following sites if they become available:

- Page 106: • creating an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing needs, the provision of area-wide economic and social infrastructure and services, including (but not limited to) the creation of new employment opportunities, a new local centre, and a new primary school should need to be established'.

**Change suggested by respondent:**

Typo and grammatical errors

Typos and grammatical errors for you to consider

• Page 105: Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 9 including Carrow Works, the Deal Ground and the Utilities Site will create a highly sustainable mixed-use gateway quarter accommodating substantial housing growth and optimising economic benefits.

Development across the sites will provide in the region of 4,000 additional homes in the plan period and significant new employment opportunities for around 6,000 jobs. East Norwich also has the potential to act as a long-term catalyst for regeneration of the wider area, potentially including the following sites if they become available:

• Page 106: • creating an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing needs, the provision of area-wide economic and social infrastructure and services, including (but not limited to) the creation of new employment opportunities, a new local centre, and a new primary school should need to be established’.

**Legally** Not specified  
**compliant:**

**Sound:** Not specified

**Comply with** Not specified  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

**Intro, 1.1**

**Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]

**Summary:**

Comments on the sites document

The following points are quite important, but are not soundness issues. They do not affect the soundness of the Local Plan. They can however be easily added to the Local Plan to provide context. Other comments would aid clarity. These comments could be addressed as additional modifications.

- Throughout the various parts - as this is a planning document, no need to say 'National Park'. Just say 'the Broads'.

There are many occurrences, so perhaps search for the term.

- It would be useful if all of the site allocation plans had street names on – the required standard for most planning applications is at least two street names.

- We note there is no mention of dark skies or limiting light pollution in the policies. The Broads has intrinsically dark skies, as can be seen at this map. We therefore recommend that wording could be added.

**Change suggested by respondent:**

Comments on the sites document

The following points are quite important, but are not soundness issues. They do not affect the soundness of the Local Plan. They can however be easily added to the Local Plan to provide context. Other comments would aid clarity. These comments could be addressed as additional modifications.

- Throughout the various parts - as this is a planning document, no need to say 'National Park'. Just say 'the Broads'.

There are many occurrences, so perhaps search for the term.

- It would be useful if all of the site allocation plans had street names on – the required standard for most planning applications is at least two street names.

- We note there is no mention of dark skies or limiting light pollution in the policies. The Broads has intrinsically dark skies, as can be seen at this map. We therefore recommend that wording could be added.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None



23358

Support

**CC16, 2.198****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Norwich sites

The following comments are factual, observations, seek clarity, seek consistency or are typographical or grammatical. They are not soundness issues, but the comments could be addressed as additional modifications.

**Observation:**

As a matter of consistency. We note that para 2.198 says this 'Given the site's highly accessible location and the intention to provide new public transport links it is considered suitable to include car-free housing. In any event car parking levels should be kept low'. We note that other sites may say that the site is considered suitable for car free housing, but the wording in those instances does not go on to talk about the last part – car parking levels should be kept low. You may want to check to see if this wording is needed for other allocations.

**Change suggested by respondent:**

Norwich sites

The following comments are factual, observations, seek clarity, seek consistency or are typographical or grammatical. They are not soundness issues, but the comments could be addressed as additional modifications.

**Observation:**

As a matter of consistency. We note that para 2.198 says this 'Given the site's highly accessible location and the intention to provide new public transport links it is considered suitable to include car-free housing. In any event car parking levels should be kept low'. We note that other sites may say that the site is considered suitable for car free housing, but the wording in those instances does not go on to talk about the last part – car parking levels should be kept low. You may want to check to see if this wording is needed for other allocations.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23360

Support

**Utilities, 0360/3053/R10 Map****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- Map page 15, this needs to show the part of the utilities site that is in the Broads. This does not affect the soundness of the Local Plan. It could, however, be easily added to the Local Plan to provide context, especially given the stance in the Plan that the sites in East Norwich are seen as one, including the part in the Broads.

**Change suggested by respondent:**

- Map page 15, this needs to show the part of the utilities site that is in the Broads. This does not affect the soundness of the Local Plan. It could, however, be easily added to the Local Plan to provide context, especially given the stance in the Plan that the sites in East Norwich are seen as one, including the part in the Broads.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23361

Support

**CC7, 2.134****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

**Change suggested by respondent:**

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23363

Support

**Utilities, 0360/3053/R10 Policy****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:****Minor points**

- Page 12, point 6 of policy. Typographical/grammatical error: 'heritage assets affected by the proposal on and off site including key views from and into the site'.
- Page 12, point 8 of policy – something to consider. You may wish consider biodiversity on this brownfield land that may establish or has been established over the years. Open mosaic habitat of intrinsic biodiversity value is a NERC Act habitat. Brownfield sites are listed as a Priority Habitat in Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act), as 'open mosaic habitat on previously developed land'. For more information go here [www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf](http://www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf) and here [jncc.defra.gov.uk/pdf/UKBAP\\_BAPHabitats-40-OMH-2010.pdf](http://jncc.defra.gov.uk/pdf/UKBAP_BAPHabitats-40-OMH-2010.pdf)

**Change suggested by respondent:****Minor points**

- Page 12, point 6 of policy. Typographical/grammatical error: 'heritage assets affected by the proposal on and off site including key views from and into the site'.
- Page 12, point 8 of policy – something to consider. You may wish consider biodiversity on this brownfield land that may establish or has been established over the years. Open mosaic habitat of intrinsic biodiversity value is a NERC Act habitat. Brownfield sites are listed as a Priority Habitat in Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act), as 'open mosaic habitat on previously developed land'. For more information go here [www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf](http://www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf) and here [jncc.defra.gov.uk/pdf/UKBAP\\_BAPHabitats-40-OMH-2010.pdf](http://jncc.defra.gov.uk/pdf/UKBAP_BAPHabitats-40-OMH-2010.pdf)

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None

23364

Support

**Policy 0068, Policy 0068****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]

**Summary:**

0068

**Main points**

- As part of point 1, refer to the scheme making the most of its riverside location, as is stated in other policies. This is a matter of consistency. 0401 and GNLP0409AR for example have good wording in point 1 that can be used. It is not clear why this wording is in most, if not all other river side policies and not this one. This may simply be a drafting error. This would make the plan consistent.
- 2.30 – support the fact that early engagement with us is recommended, but not clear why the only reason is flood risk. Or does that part of the sentence only refer to AWS? It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.

**Minor points**

- Typographical/grammatical error: 'Missing full stop:(or if developed for student accommodation, a minimum of 125 student bedrooms). A small element of commercial, office, and/or educational use at ground floor level may also be acceptable'.

**Change suggested by respondent:**

0068

**Main points**

- As part of point 1, refer to the scheme making the most of its riverside location, as is stated in other policies. This is a matter of consistency. 0401 and GNLP0409AR for example have good wording in point 1 that can be used. It is not clear why this wording is in most, if not all other river side policies and not this one. This may simply be a drafting error. This would make the plan consistent.
- 2.30 – support the fact that early engagement with us is recommended, but not clear why the only reason is flood risk. Or does that part of the sentence only refer to AWS? It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.

**Minor points**

- Typographical/grammatical error: 'Missing full stop:(or if developed for student accommodation, a minimum of 125 student bedrooms). A small element of commercial, office, and/or educational use at ground floor level may also be acceptable'.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23365

Support

**Policy 0068, 2.30****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- 2.30 – support the fact that early engagement with us is recommended, but not clear why the only reason is flood risk. Or does that part of the sentence only refer to AWS? It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.

**Change suggested by respondent:**

- 2.30 – support the fact that early engagement with us is recommended, but not clear why the only reason is flood risk. Or does that part of the sentence only refer to AWS? It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None

23366

Support

**Policy 0401, Policy 0401****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

**Change suggested by respondent:**

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None

23367

Support

**Policy 0401, 2.51****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- Typographical/grammatical error: 2.51: 'The site is likely to accommodate at least 100 homes, or if the site is developed to include student accommodation (at least 250 bedrooms)'. Suggest removing brackets as the sentence is not really reading well or right as drafted.

**Change suggested by respondent:**

- Typographical/grammatical error: 2.51: 'The site is likely to accommodate at least 100 homes, or if the site is developed to include student accommodation (at least 250 bedrooms)'. Suggest removing brackets as the sentence is not really reading well or right as drafted.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23369

Support

**CC4, CC4B Policy****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Cc4b

Main point

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

**Change suggested by respondent:**

Cc4b

Main point

- We request that wording like that at 2.134 is included in the supporting text for CC4b. '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23370

Support

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**CC4, 2.121**

**Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]

**Summary:**

- Typographical/grammatical error: 2.121: 'Development of site CC4a should explore continued use/re-provision of the existing community garden facility'.

**Change suggested by respondent:**

- Typographical/grammatical error: 2.121: 'Development of site CC4a should explore continued use/re-provision of the existing community garden facility'.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23371

Support

**CC16, 2.203****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

CC16

Main point

• 2.203 – we request that this is worded like 2.134 as follows: ‘2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority’. At the moment, what is worded only refers to the EA. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

Minor point

• Does not mention about making most of riverside location in supporting text like other policies. The actual policy does. You may wish to add something to the supporting text to be consistent.

**Change suggested by respondent:**

CC16

Main point

• 2.203 – we request that this is worded like 2.134 as follows: ‘2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority’. At the moment, what is worded only refers to the EA. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested.

Minor point

• Does not mention about making most of riverside location in supporting text like other policies. The actual policy does. You may wish to add something to the supporting text to be consistent.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None



23373

Support

**Thorpe St Andrew, 3.75****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Urban fringe

The following comment is factual. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

Factual update

- Para 3.75 – last sentence, amend as follows ‘the Church of St Andrew and its ruins’ – as both the church and ruins are listed.

**Change suggested by respondent:**

Urban fringe

The following comment is factual. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

Factual update

- Para 3.75 – last sentence, amend as follows ‘the Church of St Andrew and its ruins’ – as both the church and ruins are listed.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23374

Support

**Loddon and Chedgrave, 5.42****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Key service centres

The following comment seeks to improve context. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

Main point:

- GNLP0378R/GNLP2139R, GNLP0312 and para 5.42 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

**Change suggested by respondent:**

Key service centres

The following comment seeks to improve context. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

Main point:

- GNLP0378R/GNLP2139R, GNLP0312 and para 5.42 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23375

Support

**Policy 0378R/2139R, 0378R/2139R Policy****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Key service centres

The following comment seeks to improve context. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

Main point:

- GNLP0378R/GNLP2139R, GNLP0312 and para 5.42 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

**Change suggested by respondent:**

Key service centres

The following comment seeks to improve context. It is not a soundness issue, but it seems logical to address these comments as additional modifications.

Main point:

- GNLP0378R/GNLP2139R, GNLP0312 and para 5.42 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23376

Support

**Cantley, Settlement Map****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

Broadland villages

The following comments are factual, observations, seek clarity, seek consistency. They are not soundness issues, but it seems logical to address these comments as additional modifications.

Main points:

- Cantley map, page 15 – show the Broads for consistency and to show the context.

**Change suggested by respondent:**

Broadland villages

The following comments are factual, observations, seek clarity, seek consistency. They are not soundness issues, but it seems logical to address these comments as additional modifications.

Main points:

- Cantley map, page 15 – show the Broads for consistency and to show the context.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

**Appear exam:** Written Representation**Attachments:** None

23377

Support

**Coltishall, Horstead etc., Settlement Map****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- Horstead and Coltishall map, page 25 – show the Broads for consistency and to show the context.

**Change suggested by respondent:**

- Horstead and Coltishall map, page 25 – show the Broads for consistency and to show the context.

Legally Not specified

compliant:

Sound: Not specified

Comply with Not specified

duty:

**Appear exam:** Written Representation**Attachments:** None

23379

Support

**Policy 1001, 1001 Policy****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- GNLP1001 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

**Change suggested by respondent:**

- GNLP1001 – please also mention dark skies of the Broads. The Broads has intrinsically dark skies. You mention the setting of the Broads, which is welcomed, but please add reference to protecting the dark skies of the Broads.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23380

Support

**Coltishall, Horstead etc., 6.30****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- Coltishall, Horstead and Belaugh – should the Conservation Areas that covers parts of all three of these villages be mentioned in the text?

**Change suggested by respondent:**

- Coltishall, Horstead and Belaugh – should the Conservation Areas that covers parts of all three of these villages be mentioned in the text?

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23381

Support

**Salhouse, 6.100****Respondent:** Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]**Summary:**

- Salhouse – again should the Conservation Area be mentioned – potential for limited impact on the wider setting of the CA at the site allocated in Salhouse.

**Change suggested by respondent:**

- Salhouse – again should the Conservation Area be mentioned – potential for limited impact on the wider setting of the CA at the site allocated in Salhouse.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23917

Object

**Policy 0503, 0503 Policy****Respondent:** Mr Alec Brown [19967]**Summary:**

We fully understand that houses need to be built but are very concerned about the number of houses being proposed for Hingham.

As far as we can ascertain from the GNLP development plan the sites GNLP0520 and GNLP0503 have been allocated for development but Hingham Parish Council are not happy that these sites have been allocated. They would much prefer the sites GNLP0335 and GNLP0298 to be developed instead.

With regard the sites GNLP0502 and GNLP0503 that have been put forward by yourselves for development. If Hingham must have an increase in housing then the Norwich Road and Dereham Road sites should be developed in a way that minimizes impact on the wildlife and village amenities. If houses must be built why are they not developed in other areas using brown field sites as a development of this size would cause substantial and unacceptable harm to the character of the area and wildlife.

We fully agree that the sites GNLP0335 and GNLP0298 should not be developed for the following reasons.

The destruction of the countryside will have a detrimental effect on the habitats of wild life which includes Deer, Sky Larks and many more species of birds and animals. Could this land in question instead of being developed for housing just be re-wilded?

There is a blind bend 100m to the west of the proposed development entrance on site GNLP0298 and in our opinion the exit onto the B1108 will not be safe due to the speed of all vehicles leaving or entering Hingham. Vehicles enter the village in excess of 30 miles per hour and often ignore the 30 mile flashing speed sign telling them to slow down. When leaving the village vehicles increase their speed before reaching the 40 miles an hour speed limit sign often well in excess of this speed. After observing vehicles from my property approximately 75% of them are over the speed limit in both directions. The road is not suitable for Adults with limited mobility or children to cross. We have seen older Adults trying to cross the

road with their trolleys/walkers struggle to cross the road due to the speed for the traffic.

The developers have said about footpaths on the south side of Watton Road to GNLP0298. There is a hedge to the front of houses between 36 and 50 Watton Road. To put a footpath in would result in the destruction of more hedgerows. The path opposite on the north side opposite the proposed development entrance and exit is approx 1 metre wide and wholly unsuitable for the large amount of footfall for the development of this size.

A traffic island as proposed by the Developer would result in more destruction of hedgerows etc. I also believe this proposed traffic island would cause serious health and safety issues for people wishing to cross due to the excessive vehicle speed.

If this development were to go ahead with lorries and the large amount of construction vehicles entering and exiting the site once again I believe this would be a serious health and safety issue due to the amount of mud and debris on the road and the speed of the traffic on the B1108 in both directions.

With regard the proposed incorporation of woods on the developers plans for GNLP0335 why are the woods not at the rear of existing housing in Rectory Gardens and Watton Road rather than the back of the proposed houses. The new proposed woodland would not be planted with mature trees therefore would take 20 to 30 years to develop into a woodland. This would once again have a detrimental effect on environment and all wildlife.

Why do houses need to be built on a field that is best suited to agriculture? With an increasing population in the United Kingdom, we should be focusing on our capacity as a country to grow more crops at home and reduce our carbon footprint rather than importing food into the country. A development of this size would increase the total carbon footprint of Hingham.

The Council for the Protection of Rural England are requesting more areas be designated green belt again therefore can this area be designated green belt as it is on the south and western end of a rural settlement with views to open countryside.

**Change suggested by respondent:**

A development of any size would cause substantial and unacceptable harm to the character and wildlife of the village.

Loss of habitat for deer, skylarks, foxes, owls and other wildlife.

The vehicles entering and leaving Hingham via Watton Road are I would think in excess 75% of the time over of 30 MPH and sometimes way in excess of 30.

I think if the development GNLP0335 and GNLP0298 were to go ahead, due to the fact there is a blind bend Approx 100 metres to the west of the proposed development entrance which I do not believe has a clear line of sight due to the speed of vehicles entering Hingham along Watton Road from the west. I believe this is a serious accident waiting to happen.

Mud on the road from contractor's vehicles turning in and out during construction phase would be a very serious hazard. To the west of the proposed entrance the speed limit is 40 MPH with vehicles often well in excess of this speed entering and leaving Hingham via Watton Road.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23918

Object

**Policy 0520, 0520 Policy****Respondent:** Mr Alec Brown [19967]**Summary:**

We fully understand that houses need to be built but are very concerned about the number of houses being proposed for Hingham.

As far as we can ascertain from the GNLP development plan the sites GNLP0520 and GNLP0503 have been allocated for development but Hingham Parish Council are not happy that these sites have been allocated. They would much prefer the sites GNLP0335 and GNLP0298 to be developed instead.

With regard the sites GNLP0502 and GNLP0503 that have been put forward by yourselves for development. If Hingham must have an increase in housing then the Norwich Road and Dereham Road sites should be developed in a way that minimizes impact on the wildlife and village amenities. If houses must be built why are they not developed in other areas using brown field sites as a development of this size would cause substantial and unacceptable harm to the character of the area and wildlife.

We fully agree that the sites GNLP0335 and GNLP0298 should not be developed for the following reasons.

The destruction of the countryside will have a detrimental effect on the habitats of wild life which includes Deer, Sky Larks and many more species of birds and animals. Could this land in question instead of being developed for housing just be re-wilded?

There is a blind bend 100m to the west of the proposed development entrance on site GNLP0298 and in our opinion the exit onto the B1108 will not be safe due to the speed of all vehicles leaving or entering Hingham. Vehicles enter the village in excess of 30 miles per hour and often ignore the 30 mile flashing speed sign telling them to slow down. When leaving the village vehicles increase their speed before reaching the 40 miles an hour speed limit sign often well in excess of this speed. After observing vehicles from my property approximately 75% of them are over the speed limit in both directions. The road is not suitable for Adults with limited mobility or children to cross. We have seen older Adults trying to cross the road with their trolleys/walkers struggle to cross the road due to the speed for the traffic.

The developers have said about footpaths on the south side of Watton Road to GNLP0298. There is a hedge to the front of houses between 36 and 50 Watton Road. To put a footpath in would result in the destruction of more hedgerows. The path opposite on the north side opposite the proposed development entrance and exit is approx 1 metre wide and wholly unsuitable for the large amount of footfall for the development of this size.

A traffic island as proposed by the Developer would result in more destruction of hedgerows etc. I also believe this proposed traffic island would cause serious health and safety issues for people wishing to cross due to the excessive vehicle speed.

If this development were to go ahead with lorries and the large amount of construction vehicles entering and exiting the site once again I believe this would be a serious health and safety issue due to the amount of mud and debris on the road and the speed of the traffic on the B1108 in both directions.

With regard the proposed incorporation of woods on the developers plans for GNLP0335 why are the woods not at the rear of existing housing in Rectory Gardens and Watton Road rather than the back of the proposed houses. The new proposed woodland would not be planted with mature trees therefore would take 20 to 30 years to develop into a woodland. This would once again have a detrimental effect on environment and all wildlife.

Why do houses need to be built on a field that is best suited to agriculture? With an increasing population in the United



Kingdom, we should be focusing on our capacity as a country to grow more crops at home and reduce our carbon footprint rather than importing food into the country. A development of this size would increase the total carbon footprint of Hingham.

The Council for the Protection of Rural England are requesting more areas be designated green belt again therefore can this area be designated green belt as it is on the south and western end of a rural settlement with views to open countryside.

**Change suggested by respondent:**

A development of any size would cause substantial and unacceptable harm to the character and wildlife of the village.

Loss of habitat for deer, skylarks, foxes, owls and other wildlife.

The vehicles entering and leaving Hingham via Watton Road are I would think in excess 75% of the time over of 30 MPH and sometimes way in excess of 30.

I think if the development GNLP0335 and GNLP0298 were to go ahead, due to the fact there is a blind bend Approx 100 metres to the west of the proposed development entrance which I do not believe has a clear line of sight due to the speed of vehicles entering Hingham along Watton Road from the west. I believe this is a serious accident waiting to happen.

Mud on the road from contractor's vehicles turning in and out during construction phase would be a very serious hazard. To the west of the proposed entrance the speed limit is 40 MPH with vehicles often well in excess of this speed entering and leaving Hingham via Watton Road.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23919

Object

**Hingham, Settlement Maps**

**Respondent:** Mr Alec Brown [19967]

**Summary:**

We fully understand that houses need to be built but are very concerned about the number of houses being proposed for Hingham.

As far as we can ascertain from the GNLP development plan the sites GNLP0520 and GNLP0503 have been allocated for development but Hingham Parish Council are not happy that these sites have been allocated. They would much prefer the sites GNLP0335 and GNLP0298 to be developed instead.

With regard the sites GNLP0502 and GNLP0503 that have been put forward by yourselves for development. If Hingham must have an increase in housing then the Norwich Road and Dereham Road sites should be developed in a way that minimizes impact on the wildlife and village amenities. If houses must be built why are they not developed in other areas using brown field sites as a development of this size would cause substantial and unacceptable harm to the character of the area and wildlife.

We fully agree that the sites GNLP0335 and GNLP0298 should not be developed for the following reasons.

The destruction of the countryside will have a detrimental effect on the habitats of wild life which includes Deer, Sky

Larks and many more species of birds and animals. Could this land in question instead of being developed for housing just be re-wilded?

There is a blind bend 100m to the west of the proposed development entrance on site GNLP0298 and in our opinion the exit onto the B1108 will not be safe due to the speed of all vehicles leaving or entering Hingham. Vehicles enter the village in excess of 30 miles per hour and often ignore the 30 mile flashing speed sign telling them to slow down. When leaving the village vehicles increase their speed before reaching the 40 miles an hour speed limit sign often well in excess of this speed. After observing vehicles from my property approximately 75% of them are over the speed limit in both directions. The road is not suitable for Adults with limited mobility or children to cross. We have seen older Adults trying to cross the road with their trolleys/walkers struggle to cross the road due to the speed for the traffic.

The developers have said about footpaths on the south side of Watton Road to GNLP0298. There is a hedge to the front of houses between 36 and 50 Watton Road. To put a footpath in would result in the destruction of more hedgerows. The path opposite on the north side opposite the proposed development entrance and exit is approx 1 metre wide and wholly unsuitable for the large amount of footfall for the development of this size.

A traffic island as proposed by the Developer would result in more destruction of hedgerows etc. I also believe this proposed traffic island would cause serious health and safety issues for people wishing to cross due to the excessive vehicle speed.

If this development were to go ahead with lorries and the large amount of construction vehicles entering and exiting the site once again I believe this would be a serious health and safety issue due to the amount of mud and debris on the road and the speed of the traffic on the B1108 in both directions.

With regard the proposed incorporation of woods on the developers plans for GNLP0335 why are the woods not at the rear of existing housing in Rectory Gardens and Watton Road rather than the back of the proposed houses. The new proposed woodland would not be planted with mature trees therefore would take 20 to 30 years to develop into a woodland. This would once again have a detrimental effect on environment and all wildlife.

Why do houses need to be built on a field that is best suited to agriculture? With an increasing population in the United Kingdom, we should be focusing on our capacity as a country to grow more crops at home and reduce our carbon footprint rather than importing food into the country. A development of this size would increase the total carbon footprint of Hingham.

The Council for the Protection of Rural England are requesting more areas be designated green belt again therefore can this area be designated green belt as it is on the south and western end of a rural settlement with views to open countryside.

**Change suggested by respondent:**

A development of any size would cause substantial and unacceptable harm to the character and wildlife of the village.

Loss of habitat for deer, skylarks, foxes, owls and other wildlife.

The vehicles entering and leaving Hingham via Watton Road are I would think in excess 75% of the time over of 30 MPH and sometimes way in excess of 30.

I think if the development GNLP0335 and GNLP0298 were to go ahead, due to the fact there is a blind bend Approx 100 metres to the west of the proposed development entrance which I do not believe has a clear line of sight due to the speed of vehicles entering Hingham along Watton Road from the west. I believe this is a serious accident waiting to happen.

Mud on the road from contractor's vehicles turning in and out during construction phase would be a very serious hazard. To the west of the proposed entrance the speed limit is 40 MPH with vehicles often well in excess of this speed entering and leaving Hingham via Watton Road.

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Appear exam: Written Representation

Attachments: None

## 23687

## Object

### Aylsham, Settlement Map

Respondent: Mr James Bullimore [19897]

#### Summary:

I find myself with my head in my hands once again. How can this be correct or fair that such a decision can be taken without any input from local council or residents in Aylsham.

1- Reg 18 has stated that Aylsham would have one site put forward for consultation, reg 19 states there will be two sites.

This has never been consulted on so not legally compliant.

2- Reg 19 had failed to consider the impact of two sites on the infrastructure needs of the town, including schools, health, roads and utilities.

There will also be an increase in the carbon footprint for the town. Are these proposals sound if this is the case?

I thought we were in this together, obviously not. If you continue to bring in plans in such a stealth like manner you will lose what trust and respect we the public has in the so called democratic system.

#### Change suggested by respondent:

-

Legally No

compliant:

Sound: Not specified

Comply with Not specified

duty:

Appear exam: Not specified

Attachments: None

23495

Support

**Education and Social Mobility, 75****Respondent:** Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]**Summary:**

The provision for sufficient new schools and additional places at existing schools needs to happen in advance of the housing development if overcrowding of classrooms and relocation of children to other schools is to be avoided. Long Stratton is a prime example of where there is to be significant new housing development and if local schools do not have capacity will children from outlying villages such as Bunwell be relocated to other schools where there is capacity? That must be avoided to prevent disruption and upset to the children at an important time in their lives.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23496

Support

**Emissions and Climate Change, 95****Respondent:** Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]**Summary:**

It's no surprise that there is greater reliance on the use of the car in rural areas. In theory the Cluster Village plan makes sense but the reality is that many parents, even those living near to schools, continue to use their vehicles for dropping off and collecting the children, particularly in bad weather or if they have jobs to go to. New houses surely must now have car charging points to encourage the purchase of eco friendly hybrid and all electric vehicles which will also make housing development in non cluster villages agreeable for the longer term.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23501

Support

**Renewable Energy, 103****Respondent:** Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]**Summary:**

Cost effective and efficient means of supplying energy must be considered for the short, medium and long term. Wind farms and solar panels are not visually appealing and are expensive given production/installation costs, subsidies, back-up requirements and relative lifespan. Other energy sources such as hydrogen fuel cells are a good long term option for light/heavy transport, aviation and shipping and while currently expensive to produce, they offer great long term opportunities, particularly for a region with the sea on two sides, a huge component in hydrogen production. A combination of all energy sources is the longer term way forward

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23510

Support

**Landscape, 118****Respondent:** Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]**Summary:**

We fully support the view that our valued landscapes must be protected but some are not as we would like. Solar energy farm installations on arable land seem a questionable alternative to food production in addition to not being attractive. Wind farms are not at all appealing to the eye and are a noise intrusion for local houses. Extreme care must continue with the siting of new housing developments, large and small and to consider and avoid any loss of view for local residents and the village as a whole when alternative, less intrusive options are available.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23841

Object

**Site Assessment Booklets and Studies, Viability Study****Respondent:** Intali (Mr Adam Burdett, Director) [19912]**Summary:**

Developer Profit - No evidence provided for a reduction from 20% in the interim study to 17.5% in the final Viability Assessment (VA)

We consider this reduction to be arbitrary, un-evidenced and unjustified.

**Change suggested by respondent:**

Developer profit should be at 20% of GDV as set out in the interim viability study.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** Developer Profit 1.pdf - <https://oc2connect.gnlp.org.uk/a/46j>

23845

Object

**Site Assessment Booklets and Studies, Viability Study****Respondent:** Intali (Mr Adam Burdett, Director) [19912]**Summary:**

Build Costs - Apartments

The Viability Appraisal has an error in the calculation of build costs for apartments at para 199.

**Change suggested by respondent:**

Build costs for flats should be based on the appropriate BCIS rate for flats, not an artificially adjusted figure sourced from the BCIS build costs of houses.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** Build Costs - Apartments.pdf - <https://oc2connect.gnlp.org.uk/a/46k>

23833

Object

**Site Assessment Booklets and Studies, Viability Study****Respondent:** Intali (Mr Adam Burdett, Director) [19912]**Summary:**

Benchmark Land Value (BLV)

1. BLV adopted has not been justified by reference to any evidence, collaborative process or appropriate methodology.
2. The data provided contradicts the Benchmark Land Value assessed.
3. The BLV adopted is 72% less than the last estimate of BLV provided by Hamson in 2017.
4. The BLV adopted is below the minimum return a reasonable landowner would accept.
5. As a consequence, land will not be brought forward for development which in turn will prevent the new plan meeting its objectives.

**Change suggested by respondent:**

The BLV should be re-assessed and justified by reference to the data provided at Appendix H of the Viability Assessment and, adopting appropriate methodology and bearing in mind the requirement for a reasonable incentive for land-owners to release land for development, should reach a more logical conclusion on BLV.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Benchmark Land Value.pdf - <https://oc2connect.gnlp.org.uk/a/46f>

23835

Object

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**Site Assessment Booklets and Studies, Viability Study****Respondent:** Intali (Mr Adam Burdett, Director) [19912]**Summary:**

Typology 11 - Unrealistic Gross to Net Areas Assumption

The Viability Assessment (VA) assumes a net to gross ration of 88% for Typology 11. This is not practical or feasible in reality. as demonstrated by a recent application of a similar sized site (2019/1370) which showed 49% net to gross ratio.

The VA assumes that all informal open space will be provided off-site. This is unlikely to be acceptable in reality.

There is no allowance made for infrastructure provision on large sites

**Change suggested by respondent:**

The net developable area for Typology 11 should be re-assessed.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** Typology 11 - Net & Gross Areas.pdf - <https://oc2connect.gnlp.org.uk/a/46h>



23836

Object

**Site Assessment Booklets and Studies, Viability Study****Respondent:** Intali (Mr Adam Burdett, Director) [19912]**Summary:**

Revenue Assumptions Not Sound

From our own research of actual sales data, we consider the revenues adopted in the Viability Assessment (VA) to be excessive.

Revenues should be calculated using Land Registry sale price data, not asking prices.

Inaccurate revenues distort the outcome of the viability assessment and should be re-assessed.

**Change suggested by respondent:**

The purpose of the Local Plan Viability is to assess the revenues that will be generated and that can only be reliably assessed using actual sales data.

Re-assess revenues using Land Registry data only.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Revenues.pdf - <https://oc2connect.gnlp.org.uk/a/46x>

23585

Object

**Aylsham, 4.5****Respondent:** Burgh and Tuttington Parish Council (Dr Simon Covey, Councillor) [19386]**Summary:**

An additional 300 houses have been inserted into the plan for Aylsham at the GNL P Regulation 19 stage on which we were not consulted. This will potentially alter the market town character of Aylsham and put added pressure on services and infrastructure, especially the sewerage plant which pumps treated material into the Bure just upstream of our parish. There is evidence that the treatment plant has insufficient capacity for the 550 additional families now expected. We argue the plan is not legally compliant nor sound as there was no consultation or opportunity to influence the decision allocating the extra housing.

**Change suggested by respondent:**

Because the risks to Aylsham and to our parish have not been adequately consulted on or assessed in sufficient detail, we would like to see the extra proposed housing allocation at site GNL P0596R removed from the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** Ref 400 - GNL P0336 Foul Drainage Assessment.pdf - <https://oc2connect.gnlp.org.uk/a/45b>  
Parliament\_sewage.pdf - <https://oc2connect.gnlp.org.uk/a/45c>

24145

Object

**Policy 0596R, 0596R Policy****Respondent:** Buxton with Lamas Parish Council (Mrs Laura Apps-Green, Clerk) [12592]**Summary:**

The PC (Buxton with Lamas) does not believe that the second additional site for Aylsham should have been added within regulation 19 without full consultation and that if they were to get permission the infrastructure would not cope. Schools are full, doctors' surgeries are full, the parking is totally inadequate. The impact of infrastructure of an additional site could not have been examined or considered by the officers, Broadland district council as the second site was not included for housing allocation in reg 18 consultation, so could not be consulted on and therefore is not sound or legally compliant.

That phasing of two sites to aid any identified infrastructure problems which may have been identified via consultation could not be considered as the second site was not consulted on in reg 18, therefore, is not legally sound or properly prepared.

Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate] requires Broadland to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. Buxton with Lamas parish council were not consulted on with regard to the second site as this was not put forward in reg 18 and therefore is not sound or legally compliant or properly prepared.

**Change suggested by respondent:**

What does the parish council consider should be altered as a result of reg 19 consultation? That the addition of a second site should be removed, as this was not consulted and any possible infrastructure issues identified or examined or considered there for is not legally sound or properly prepared. If the second site is not removed at this stage, then to ensure that this is legally sound and properly prepared then this should be consulted on as per reg 18 stage again to make legally sound, compliant and properly prepared, which may mean the second site is removed or phasing takes place once infrastructure has been examined and considered or it is demonstrated that the infrastructure can support, then proceed to reg 19 to ensure legally sound, compliant and properly prepared.

**Legally** No  
**compliant:**

**Sound:** Not specified

**Comply with** Not specified  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24119

Object

**Reepham, 5.54****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24120

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24121

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24122

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 4 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing Policy 4 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24123

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 5 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing Policy 5 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24124

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 6 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing Policy 6 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24125

Object

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**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24126

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.3 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLPO353R).

**Change suggested by respondent:**

Please see the section addressing Policy 7.3 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

24127

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Change suggested by respondent:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>



24128

Object

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**Policy REP1, REP1 Policy****Respondent:** Michael & Jackie Buxton [20050]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49n>Appendix 2 - <https://oc2connect.gnlp.org.uk/a/49y>Dereham Road, Reepham - <https://oc2connect.gnlp.org.uk/a/49p>

23469

Object

**Policy 0596R, 0596R Policy****Respondent:** Margaret Callingham [19880]**Petition:** 3 petitioners**Summary:**

GNLP0596R – Aylsham Housing Allocation

At the Consultation Meeting in 2018/19 there was mention of one site for an additional 300 houses to be built. Even here the numbers have risen from 300 – 780.

Imagine our surprise and dismay to find another additional site of 250 houses has appeared out of nowhere without consultation with us the residents, or our local councillors or representatives. Corporate bullying and total lack of thought for us all comes to mind.

This makes one question the legality of this being pushed through by the GNLP at an advantageous time for them (Covid 19) without due consultation.

Our infrastructure is already straining under the pressure of recently built homes. The schools are at capacity, doctor surgeries are full, sewage and water systems unable to cope.

We here in Buxton Road have had to call the waterboard out several times due to the stench of sewage systems backing up under the strain. Some residents have sold up and moved on because they were unable to cope. What do you think is going to happen with an additional (unwelcome) 250 houses?

Our roads are already straining to cope and our lovely Market Town is fast losing it's beautiful character.

What is the point of having such meetings, only to be overruled whenever "the powers to be" choose? We feel the GLNP have, with no advance notice, completely disregarded people's and our town council's opinions.

We protest vehemently....

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23471

Object

**Policy 0596R, 0596R Policy****Respondent:** Sophie Callingham [19881]**Summary:**

GNLP0596R – Aylsham Housing Allocation

At the Consultation Meeting in 2018/19 there was mention of one site for an additional 300 houses to be built. Even here the numbers have risen from 300 – 780.

Imagine our surprise and dismay to find another additional site of 250 houses has appeared out of nowhere without consultation with us the residents, or our local councillors or representatives. Corporate bullying and total lack of thought for us all comes to mind. This makes one question the legality of this being pushed through by the GNLP at an advantageous time for them (Covid 19) without due consultation.

Our infrastructure is already straining under the pressure of recently built homes. The schools are at capacity, doctor surgeries are full, sewage and water systems unable to cope.

I am aware the waterboard was called out several times due to the stench of sewage systems backing up under the strain. Some residents have sold up and moved on because they were unable to cope. What do you think is going to happen with an additional (unwelcome) 250 houses?

Our roads are already straining to cope and our lovely Market Town is fast losing it's beautiful character.

What is the point of having such meetings, only to be overruled whenever "the powers to be" choose? We feel the GLNP have, with no advance notice, completely disregarded people's and our town council's opinions.

We protest vehemently....

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23378

Object

**Aylsham, 4.4****Respondent:** Ms Lesley Cannon [19840]**Summary:**

I am in agreement with Trevor Bennett's comments:

"The decision to allocate 550 more homes when there are still homes to be completed is unsound due to the impact on the infrastructure of the town. There is no indication as to when the Primary School would be built, when all the schools in Aylsham and the surrounding area are at capacity now. The decision to put forward a care home demonstrates a lack of consultation, not just with the Town, but also Aylsham Care Trust. This allocation is also in conflict with points 132 and 136 of the GNLP's strategy."

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn, as the impact on the infrastructure will be too damaging. For any further development to happen the needs of the infrastructure such as the primary school should be met before houses are built.

**Legally** No  
compliant:

**Sound:** No

**Comply with** No  
duty:

**Appear exam:** Written Representation

**Attachments:** None

23595

Object

**Aylsham, 4.4****Respondent:** Ms Lesley Cannon [19840]**Summary:**

i fully support the views of MR Prekopp.

**Change suggested by respondent:**

I AGREE WITH THE views of MR Prekopp.

**Legally** No  
compliant:

**Sound:** No

**Comply with** No  
duty:

**Appear exam:** Written Representation

**Attachments:** None

23594

Object

**Aylsham, 4.2****Respondent:** Ms Lesley Cannon [19840]**Summary:**

This plan is unsound. Reg 18 stated that Aylsham would have one site in this plan. All the comments and proposals are being made for this one site. Aylsham has several day markets in the market place, none are more important than the 2 Saturday Farmer Markets. They are held on the first and last Saturdays of each month drawing the greatest number of traders and customers and tend to outshine the two weekday markets on Mondays and Friday in more normal times. The smaller Monday Market is more well known as it occurs when the Keys Auctions are held.

**Change suggested by respondent:**

Reference to the correct information regarding market trading days. Full consultant action needs to be seen to take place with the population in the town before a second site can be given any clearance.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23597

Object

**Aylsham, Settlement Map****Respondent:** Ms Lesley Cannon [19840]**Summary:**

I agree with the views of the others expressing concern over the lack of consultation for the changes to the original planed number of new build houses for the Burgh Road site and the addition of the site off the Norwich Road for which there has been no consultation with the town folk.

**Change suggested by respondent:**

Consultations is needed on record with the town on all the issues arising should this additional number increase go ahead. items such as: local infrastructure needed to support the population growth and a clear statement for the panning of provision of adequate school places before any further building takes place in this area as local schools are already at full capacity.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23590

Object

**Aylsham, Settlement Map****Respondent:** Corinda Carnelley [19914]**Summary:**

I would like to comment on the soundness and legal compliance of the Greater Norwich Local Plan regarding housing developments in Aylsham.

1. The proposals are not legally compliant as regulation 18 states that Aylsham would have one site and regulation 19 states there will be two sites. This has never been consulted on.
2. The proposals are not sound as regulation 19 failed to consider the impact of two sites on the infrastructure needs of the town including schools, health facilities, roads and utilities.

**Change suggested by respondent:**

I would like to comment on the soundness and legal compliance of the Greater Norwich Local Plan regarding housing developments in Aylsham.

1. The proposals are not legally compliant as regulation 18 states that Aylsham would have one site and regulation 19 states there will be two sites. This has never been consulted on.
2. The proposals are not sound as regulation 19 failed to consider the impact of two sites on the infrastructure needs of the town including schools, health facilities, roads and utilities.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

23693

Object

**Aylsham, Settlement Map****Respondent:** John Carnelley [19934]**Summary:**

I would like to comment on the soundness and legal compliance of the Greater Norwich Local Plan regarding housing developments in Aylsham.

1. The proposals are not legally compliant as regulation 18 states that Aylsham would have one site and regulation 19 states there will be two sites. This has never been consulted on.
2. The proposals are not sound as regulation 19 failed to consider the impact of two sites on the infrastructure needs of the town including schools, health facilities, roads and utilities.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appeal exam:** Not specified

**Attachments:** None

24146

Object

**Site Assessment Booklets and Studies, Gypsy and Travellers****Respondent:** Stuart Carruthers [17100]**Summary:**

1. The Gypsy/ Traveller Accommodation Assessment is flawed, and fails to take proper account of need / supply. I act as agent for a large number of the people affected by the LPA's.

2. The Town and Country Planning system is expected to be a standalone jurisdiction. There have been significant breaches of the Town and Country Planning Act 1990 by two of the authorities. This includes over-enforcement of enforcement notices, failure to take account of grant of planning permission under s173(11), falsification of ownership of land by LPA's, demolition of listed buildings to secure benefits for Councillors, claiming of notices not contained in the s188 register.

There needs to be a clear provision of the equivalent of a Criminal Complaints Review System to cover the LPA's (including compensation provisions). There additionally needs to be procedures under s173A to enable applications by citizens to enable certification of fraud by the Council's acting as a LPA. Without these provisions it is likely that there shall continue to be extensive breaches Human Rights and Equalities legislation.

**Change suggested by respondent:**

1. Re-examination of the GTAA and correct identification of need and supply.

2. Provision of equivalent of Criminal Complaints Review Commission to correct breaches of planning law by LPAs. The City of Norwich Council and South Norfolk District Council have admitted to acts of fraud I falsification of notices / over-enforcement etc. These acts have been used to seek to secure benefits for Cllrs and their friends. The Broadland District Council and South Norfolk District Council have admitted to not maintaining their s188 registers. The South Norfolk District Council has admitted to its current political leader engaging in acts of what could be considered fraud through their role in administering the Planning Acts.

The City of Norwich has registered significant areas of land to which it has admitted to having no deeds. The LPAs as a result of their acts to secure benefits for local politicians and their friends have been able to breach Human Rights and Equalities Legislation due to their Local Planning documents not having the required redress procedures and this being properly taken into account through Equality Impact Assessments. Full documentation is available.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None



23591

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Roger Carter [19915]**Summary:**

As a resident of Norwich I would like to express my views on and criticism of the Greater Norwich Local Plan.

The Plan is unsound because the Norwich Western Link Road should not be included in the Plan. This proposed road scheme is not compatible with planned carbon reduction objectives. The proposed road should also not be in the Plan because there are many insurmountable planning issues associated with it, in relation to Wensum SAC and the concomitant Habitats Regulations. The Wensum is a precious chalk stream habitat.

The Plan is unsound because it lays out no coherent policy on climate change, and proposes no carbon budget for the area.

The Plan is unsound because it massively increases housing numbers beyond what the government is requiring, numbers in excess of what is environmentally sustainable.

The Plan is unsound because it does not amount to "balanced sustainable development" and does not comply with UN Sustainable Development goals to protect the environment whilst achieving social and economic gains.

**Change suggested by respondent:**

As a resident of Norwich I would like to express my views on and criticism of the Greater Norwich Local Plan.

The Plan is unsound because the Norwich Western Link Road should not be included in the Plan. This proposed road scheme is not compatible with planned carbon reduction objectives. The proposed road should also not be in the Plan because there are many insurmountable planning issues associated with it, in relation to Wensum SAC and the concomitant Habitats Regulations. The Wensum is a precious chalk stream habitat.

The Plan is unsound because it lays out no coherent policy on climate change, and proposes no carbon budget for the area.

The Plan is unsound because it massively increases housing numbers beyond what the government is requiring, numbers in excess of what is environmentally sustainable.

The Plan is unsound because it does not amount to "balanced sustainable development" and does not comply with UN Sustainable Development goals to protect the environment whilst achieving social and economic gains.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** None

23265

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Mr Stephen Carter [19793]**Summary:**

The consultation of the plan should have been carried out in accordance with the Statement of Community Involvement (2016) (Amended 2019). This was not done.

It is unclear if there is sufficient infrastructure available to support the increased number of houses in Acle.

It appears objections made by the local council have not been considered.

**Change suggested by respondent:**

remove new allocations

hold a public consultation

ensure infrastructure such as schools and broadband are sufficiently upgraded before any further building commences.

Provide recourse where promises by the developers are not kept as has happened on other new estates in the area.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23951

Object

**Communities, 132****Respondent:** Ms Sue Catchpole [19509]

**Summary:****Response to GNLP Regulation 19**

The Local Planning Authority has failed to engage with Aylsham District Councillors, Aylsham Town Council and the local community except through the formal Regulation 18 BLP Consultation which considered only one site for development. There has been radio silence since then until the release of the Reg 19 plan, in spite of the Council recognising a need to alter the way they communicate with interested parties through the publication of the "Temporary update in response to Covid-19 guidance (July 2020)". The Covid-19 pandemic can not be used as an excuse for lack of consultation. Aylsham Town Council continued to meet over Zoom and Councillors were still available. The LPA also uses the Facebook social media platform via the page 'Aylsham and the Surrounding Villages' to promote its services to the residents of Aylsham. This could have been one way of consulting the community.

Lack of consultation is contrary to the LPA's own Statement of Community Involvement which says under "Standards for effective community involvement" at 1.15 that the Council will;

- Adopt an inclusive approach, ensuring that those who have an interest in the topic have the opportunity to contribute from an early stage and throughout the process.

And under "Planning and community involvement"

1.6 Paragraph 155 of the National Planning Policy Framework (2012), where it discusses plan making, states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'

And

1.7 This sets out a firm, national directive that local planning authorities should be seeking the views of communities and other stakeholders from an early stage in the development of their local planning documents.

As the Council appears not to have followed its own procedures or met its own standards, the decision to pursue two large housing development sites instead of only one, is not sound. There will be no evidence of how the Council complied with this duty.

Any further development must be in keeping with the points laid out in the Aylsham Neighbourhood Plan.

Aylsham has recently expanded with the addition of at least 500 homes over a few years. Certainly, even one more development over the coming 15 years will add strain to the community, facilities, services and infrastructure. What is the hurry? As a rural Norfolk market town, Aylsham now needs time to adapt and integrate the residents of the two new housing developments at Willow Park and Bure Meadows. Whichever ONE further site is selected for development before 2038, more homes can be provided if a reasonable number of small, one bedroom properties are included. The type of homes built should reflect the actual need in our community.

**Change suggested by respondent:**

The inclusion of a second site put forward in Reg 19 should be withdrawn.

The proposed second site was randomly deposited in Aylsham in Reg 19 to meet an arbitrary target. The impact of Covid and Brexit will almost certainly lead to an increase in the number of town centre sites becoming available for development.

**Legally No  
compliant:**

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

**23952**

**Object**

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**Infrastructure, 142**

Respondent: Ms Sue Catchpole [19509]

**Summary:****Response to GNLP Regulation 19**

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**Legally No  
compliant:**

Sound: No

Comply with No  
duty:

Appear exam: Appearance at the examination

Attachments: None

**23953**

**Object**

---

**Infrastructure, 143**

Respondent: Ms Sue Catchpole [19509]

**Summary:****Response to GNLP Regulation 19**

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**Legally No  
compliant:**

Sound: No

Comply with No

duty:

Appear exam: Appearance at the examination

Attachments: None

24419

Object

## Housing Growth Needs, Table 6 Establishing the Plan's total housing potential figure

Respondent: Mr Andrew Cawdron [12806]

### Summary:

There is an overarching question as to whether the GNLP public consultation process breaches the principle of fairness as R v Brent London Borough Council, ex parte Gunning (1985) and R (Moseley) v London Borough of Haringey (2014). The Greater Norwich Development Partnership (GNDP) Board papers and minutes of the meeting on 10 July 2020 make it clear that a Re. 18D consultation was intended from 2 November 2020 to 14 December 2020. At a subsequent Board meeting of 30 September, this was removed with progress straight to the Reg 19 consultation.

The Reg 19 v 1.7 GNLP document and the supporting studies which GNDP Board proposes to submit for inspection, include significant changes to the subject matter on which the public were consulted in Reg 18 contrary to provision 18 (1) (a) of the Town and Country (Local Planning) (England) Regulations 2012.

There is an overarching question as to whether the GNLP public consultation process breaches the principle of fairness as R v Brent London Borough Council, ex parte Gunning (1985) and R (Moseley) v London Borough of Haringey (2014). The Greater Norwich Development Partnership (GNDP) Board papers and minutes of the meeting on 10 July 2020 make it clear that a Re. 18D consultation was intended from 2 November 2020 to 14 December 2020. At a subsequent Board meeting of 30 September, this was removed with progress straight to the Reg 19 consultation.

The Reg 19 v 1.7 GNLP document and the supporting studies which GNDP Board proposes to submit for inspection, include significant changes to the subject matter on which the public were consulted in Reg 18 contrary to provision 18 (1) (a) of the Town and Country (Local Planning) (England) Regulations 2012.

The paper submitted to GNDP Board meeting of 7 December 2020 states at item 8 that "It is important to note that, as the Regulation 18 consultation stage has informed the content of the plan, the Regulation 19 stage is not a general consultation"

Just how reg. 18 has informed the Reg. 19 draft is unclear, as the housing numbers now proposed were not presented in the earlier consultations and the explanation of the changes are subjective interpretations of possible growth and the Government's policy of increased housing numbers arising from publications issued after Reg.18.

Commentary under Reg. 19 is restricted to soundness only and therefore opportunity is denied for public representation concerning the resultant increase for housing numbers to those on which the public were specifically asked to comment in the various stages of Reg. 18 consultations.

The September GNDP Board meeting resolved to "Keep the position under close review. Further information is likely to be available in the New Year on the level of housing need resulting from the standard methodology, the timing of the introduction of the new legislation and the detail of the transitional arrangements."

The number of new homes was increased from circa 40,000 to 49,000 in the Reg. 19 document submitted to and approved by the GNDP Board on 7 December 2020. The breakdown of the new figure is given in Table 6 (page 47) in the Reg. 19 v 1.7 which includes 1,296 windfalls, 2,864 new allocations plus 800 houses under policy 7.5.

It is evident that an increase in general allocations is now included contrary to the GNDP Chairman's statement at the Board meeting of 30 September 2020 that there was a capacity in windfall sites to increase the housing numbers.

On 16 December 2020 the Government announced that it was rescinding its consultation proposals for calculating housing requirement numbers and that the method suggested in 2017 would continue. The issue of Reg. 19 v 1.7 post-dates this Government announcement, but persists with the increase in the buffer. The Government continuance of existing methodology confirms the projected housing need to be 40,541 and negates any necessity to revise numbers from those in the Reg. 18 consultations.

It is considered that account should have been taken of the most recent Government position. Inexplicably, no revisions



were made to the draft to reflect the Government decision in the Cabinets of the 3 Councils in January 2021 determining that the GNLP should go to public consultation.

The Reg. 19 v 1.7 attempts to justify this by the inclusion at paragraph 178 that the higher buffer provides “the potential to accommodate higher growth rates as signalled both by the Government’s “Planning for the Future” consultation and by the 2018-based projections for Greater Norwich which are somewhat higher than the 2014-based projections”.

These reasons presented to Boards and Cabinets are no longer valid as the 16 December 2020 Government Response to its national consultation

- Confirmed that the existing methodology of calculating housing numbers would continue using the 2014-based projections; and
- The direction of travel for higher growth rates of housing numbers was clarified as applicable to 20 specific urban areas by the addition of a 35 percent uplift in the requirements. Greater Norwich is not one of these areas.

This flexibility suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology.

At a subsequent Cabinet meeting of Norwich City on 11 February 2021 discussing climate change, the question was raised concerning the implications for this critical issue of increasing the buffer to 22% in the Reg. 19 draft. The response by a planning officer was that GNDP Board was in the process of commissioning an updated Housing Needs study which would be due in May 2021 and it is expected that this will support the housing numbers in the plan. An expectation of future confirmation of one of the critical aspects of the Plan cannot be considered as sound or justified. The public are denied the opportunity to comment on the increased arbitrary buffer.

It is suggested the modifications should be offered back to another Reg.18 consultation, which has previously been mooted by the GNDP Board, as and when the study is available so that the public can assess what is being proposed.

Discrepancies in the Consultations:

Both the Reg. 19 Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) refer to Reasonable Alternatives in the Reg. 18A consultation Growth Options Document and associated Interim SA Report.

The specific three questions (4, 5, 6) on housing growth numbers offered to the public at page 19 were:

- Do you agree that the OAN for 2017 – 2036 is around 39,000 homes?
- Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?
- Do you agree that windfall development should be in addition to the 7,200 homes?

The consultation offered no alternative for housing numbers apart from the question of whether windfalls should be within or extra to the buffer.

The single preferred option was presented in Reg. 18A as 42,887 homes (OAN as 38,988 + 10% buffer, including windfalls).

The 7,200 homes in the Reg. 18A questions relate to the allocation on new sites which are required over and above existing commitments to achieve the stated (rounded) housing target of 42,900 over the plan period.

Reg. 18A consultation offered 6 growth options for locating distribution of the planned housing growth, all providing a total provision of 42,865 homes, including 7,200 new allocations, with a note that the final selection may be a combination of the alternatives.

The public were not asked specific questions on the options in the Interim SA although there was a general invitation to make representations on this separate accompanying document.

It is difficult to understand the logic of this section of the Interim SA as it explicitly contradicts the consultation questionnaire which states at paragraph 4.22 “A delivery buffer lower than 10% would make it much less likely that needs would be met. A higher figure might be expected to increase the likelihood that housing need would be delivered, but it would also increase uncertainty for both housing developers and infrastructure providers, potentially risking delivery” [Emphasis added]

The subsequent Reg. 18C consultation, January to March 2020, changed the housing numbers proposed from those in Reg. 18A from circa 42,900 to 44,343 which was assumed to reflect the change of the plan period from 2017 – 2036 (19 years) to 2018 to 2038 (20 years).

This minor change was considered to be in line with the principles of the earlier Reg. 18A document, confirming the erroneous nature of the section in the Interim SA for a 20% buffer.

No further supporting SA or HRA documents accompanied the Reg. 18C consultation which must assume that a conclusion had been reached that the contradictory alternative housing numbers in the Interim SA do not apply or have

been discounted.

Yet the final Reg. 19 SA and HRA documents give credibility to this anomalous section of the Reg. 18 suite of documents. Table 6 at paragraph I 58 in the Reg. 18C Strategy states that the housing numbers provide a 9% buffer to cater for any non-delivery of sites to ensure delivery of local housing need. The publication version of the plan will aim to provide a minimum 10% buffer (a minimum of a further 250 homes) which is likely to be provided through a combination of additional sites proposed through this consultation and contingency sites identified in this draft plan.

#### Housing Buffer

The dictionary definition of a buffer in this context is - an extra supply of sites to prevent a shortage of land available to meet the need. In other words these allocations should act as a contingency. By including this in the plan, they become an integral part of it, thereby creating a surplus.

Housing provision without a buffer is not explored in the consultations, but may be a reasonable or the preferred alternative, particularly relative to environmental protection and climate change.

Both the Reg. 18 and 19 consultation proposals also note sites as a contingency outside the plan. This is a further addition to the buffer contingency in the plan.

The key to ensuring adequate land supply is regular robust monitoring and management practices and not a reliance on an excessive over provision in the Plan.

NPPF requires policies in local plans and spatial development strategies to be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

On 16 December 2020 the Government published an Indicative Housing Needs calculation for the whole of England. The annual projection for Greater Norwich is 2,008 p.a. based on the current calculation methodology, giving a projected need of 40,160 for the 20 years 2018 to 2038, a number closely aligning with the original 40,541 base housing needs in the draft plan.

Practically, the buffer allowance allocations and the contingency site(s) should be listed separately outside the Plan in order of environmental preference, only to be activated as necessary to maintain the five year land supply as existing commitments are built out or delayed.

NPPF requires that a 5 % buffer should be added as default and a maximum of 20% as a penalty for failure to meet [sic] delivery targets in the 5 year land supply calculations.

The only figure which requires incorporation in the GNLP is the minimum housing need over the period, which could change annually dependent upon delivery.

#### Deliverability:

The Reg. 18 Stage C noted that "The plan promotes a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be evidenced". A footnote is added to this statement that "The housing allocations in this draft plan will only be carried forward to the submission version of the plan, if evidence is presented to show that they will be delivered by 2038".

This certainty has been downgraded in the Reg. 19 documents to a reasonable prospect of delivery.

There is no certainty of delivery in the GNLP either annually or over the timescales of the plan. Historically, speed of overall housing delivery is dictated by the market, with the exception of periods, in the distant past, when there were large numbers of subsidised council housing built.

By proposing land to provide a 22% to 31 % over provision, purely as a contingency, the Plan would lead to planning applications to reserve the changed land status and value, but not necessarily lead to estates being built out.

The Delivery Statement at page 39 of the Reg. 19 draft plan that "Where delivery cannot be demonstrated to be in accordance with agreed delivery plans for individual sites, the authorities will, as appropriate, make use of their legal powers to bring about strategically significant development, including compulsory purchase" is intriguing. Whilst laudable to ensure that housing builds are met, as a solution this is a difficult exposure to the public purse, particularly as failure to deliver may be caused by a loss of market demand.

Paragraph 171 of NPPF notes that "Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."

[Emphasis added].

There is no evidence in the Reg. 19 Sustainability Appraisal that land allocation has been selected as of the least environmental value or that there is a hierarchy of sustainability compliance.

The Interim Sustainability Appraisal noted "Due to the range of alternatives (sic sites) under consideration, and therefore possible permutations for the final plan, it is not reasonably practical at this stage to undertake an overall assessment of the impact of the Plan at this stage. This assessment will be undertaken for the purposes of the Sustainability Appraisal that accompanies the pre-submission version of the GNLP."

However, most of the assessments in the proposed final SA are reproductions of the tables in the Interim SA and the hierarchy sustainable impact is still absent.

What would have been advantageous in the most recent Sustainability Appraisal to enable proper, fair public scrutiny, would be a clear statements of additional benefits and/or adverse sustainability and environmental implications.

#### Change suggested by respondent:

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

Legally No  
compliant:

Sound: No

Comply with Not specified

duty:

Appear exam: Appearance at the examination

Attachments: Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

## 24423

## Object

### Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure

Respondent: Mr Andrew Cawdron [12806]

#### Summary:

The plan is short of information as to the effect on transport anticipated from the correlation for housing and employment sites.

Paragraph 294 of Reg.19 reports the conclusion of the Employment Town Centre and Retail study (GVA 2017) and the Avison Young 2020 addendum in that "although Greater Norwich has enough employment land overall, most of this is out-of-centre and is neither the preferred location for some growth sectors nor the most sustainable place for high intensity employment/ office growth".

The paragraph adds that "there is a risk that this may lead to new such development going to less sustainable locations with serious impacts on the vitality of the city centre and undermining policies to encourage modal shift. Therefore, it is essential that this plan ensures that high density employment uses are concentrated in highly accessible locations in particular the city centre, and that loss of existing floorspace in the city centre is resisted". [Emphasis added]

This reality is not adequately addressed in the plan with the majority of employment locations at the cardinal points on the edges of the urban fringe and 13% only in the city centre, which will not resolve this risk or reduce reliance on the car for commuting.

Policy 4 in the draft Reg. 19 v 1.7 notes that "Transport improvements will support and embrace new technologies and develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport".

The statement is made that it will be achieved by Implementation of the Transport for Norwich Strategy including:

- significant improvements to the bus, cycling and walking networks to promote modal shift;
- developing the role of the park and ride system;
- changing attitudes to travel;
- delivery of the Norwich Western Link road

There is little substance in how these will be achieved.

The specific inclusion of the Norwich Western Link as part of the GNLP is unjustified as this new road does not have planning consent and is environmentally and ecologically damaging, with no effective mitigation being possible. There appears to be an implication that planning consent is a given.

#### Norwich Western Link and Legal Compliance

Reg. 19 paragraph 138 simply notes the NWL as one of the road schemes which will enhance transport in Greater Norwich. The support of this project by GNDP Board is confirmed by the statement in its 2020 Greater Norwich Infrastructure Plan which confirms "The Greater Norwich authorities are promoting the construction of a new highway link ('Norwich Western link'), which will link the Broadland Northway with the A47 to the west of Norwich" (paragraph 3.9). [Emphasis added]

The NWL is included in the Norfolk Infrastructure Delivery Plan (NIDP) 2017 - 2027 (latest update 20 19) which is promoted by Norfolk County Council and all the local authorities of the county as partners.

The NIDP states that all projects included are judged on three criteria

- Delivering significant housing and jobs growth[Emphasis added]
- Identified in existing plans/programmes
- Have a committed route to delivery

The GNLP does not contain any reference to the NWL delivering any of the housing or jobs, unlike the existing JCS, which made the Broadland Growth Triangle dependent on the NDR.

98. At the Planning Inquiry for the NOR a link across the Wensum Valley was specifically and deliberately excluded.

The employment sites at Policy 3 in the 2014 adopted JCS (within the Norwich Policy Area, Thorpe St Andrew, Longwater, Norwich Research Park, Norwich Airport, Rackheath, Hethel and Wymondham will be the focus of further jobs growth) are basically as those now being promoted by the GNLP.

The only apparent change is the addition of the Food Hub at Easton, for which a Local Development Order (LDO) was granted in 2016. To date there is a single occupant, Condimentum, which is a mustard milling and mint producing facility. The LDO planning decision does not reference the need or the NWL and currently only 40% of the allowable floorspace is permitted until a direct access to the A47 is provided.

Norfolk County Council has published its Norfolk Transport Plan 4 draft on its website in which an explanation is made to justify the NWL as one of the priorities "to tackle infrastructure deficit". The priorities include the Norwich Western Link, A 140 Long Stratton Bypass, A 10 West Winch Housing Access Road, full dualling of the A47 and improvements to the major rail links to London and Cambridge.

Policy 14 outlining plans for access to and around Norwich include the introductory paragraph "NCC want to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network, in particular through the completion of the Norwich Western Link." There is no explanation as to how the NWL will encourage more sustainable forms of transport.

At Reg. 19 paragraph 240 the GNDP attempts to distance itself from the HRA obligations in connection with the NWL by stating that the scheme is identified as one of Norfolk County Council priorities and in paragraph 245 that the GNLP authorities will only give it support "provided that their promoters and the relevant competent authority are able to demonstrate that they would not conflict with other policies of the plan and where there would be no adverse effect on the integrity of sites protected under the Habitats Regulations Directive."

The inclusion of paragraph 245 was added to the Reg. 19 document in response to the HRA Report that the NWL and other projects are outside the control of the GNDP.

The text in GNDP Response to draft HRA (Dec 2020) recommendations for Reg. 19 GNLP is "Although the principle of the recommendation is agreed with, the suggested text is not al/ necessary to provide adequate clarification as the issue of the Norwich Western link is already explained in the Plan (see para. 240). Therefore, a change has been made to the supporting text, based on the latter part of the suggested text, adding a new paragraph (245)."

This raises fundamental questions of responsibility under the Habitats Regulations in preparation of strategic plans. The GNDP appear to accept that the GNLP falls under the Habitats Regulations in that it has commissioned an overarching HRA.

The critical question is whether the author of the GN LP takes responsibility for all aspects of the plan including projects which are under the control of one of the partnering members of the GNDP.

To a greater or lesser extent all the projects, i.e. development of the individual sites, are in the control of one or other of the partnering members and it is assumed that each LPA will ensure that the developers provide sufficient information to enable the authority to make an appropriate assessment for HRA if required.

The situation concerning the NWL differs in that the County Council are both the Planning Authority and Promoter/Developer for the road. As a relevant competent authority it should be making appropriate assessments both for any plans it prepares as well as specific planning applications for projects it has to determine.

In fact NCC has already carried out an appropriate assessment on the NWL in 2005 and restated this again in 2016 as justification to the Planning Inspectorate as to why the NDR could not cross the Wensum Valley.

That assessment by the then Head of Law had a four point conclusion (see NCC/EX/65 on the Norfolk County Council website for Broadland Northway) that:

- The available evidence suggests strongly that a new or widened carriageway crossing (the SAC) will have that (significant) effect.
- Although a full and detailed assessment to the level required for an Appropriate Assessment had not been undertaken, the evidence currently available to the County Council suggests that a new or widened carriageway would adversely affect the integrity of the SAC.
- Three potential other solutions were noted, two of which were offered to the Committee for consideration namely, (a) a scheme (in effect the purple/brown route), which utilises the existing single carriageway crossing and (b) a partial route without the brown or purple route.
- Leading Counsel has advised that although there is clearly an economic and social justification for the scheme, only relatively little weight would be attached to the need to relieve congestion in the Norwich area.

This conclusion would suggest that there was an absence of reasons to justify overriding the negative impacts at that time and the GNLP does not offer any new evidence to counter this extant legal opinion.

Regulation 7c of the Habitats Regulations notes that a competent authority includes "any person exercising any function mentioned in sub-paragraph (a) or (b)", which includes public bodies of any description. In the case of the GNLP, the GNLP is acting on behalf of all five partners and assumes the responsibility for the Habitats Regulations in the whole plan.

For this reason it is unacceptable to knowingly include a project subject to a current HRA negative finding and relying on one of the partners proving at some date in the future that this will be overturned.

Minutes of the GNLP Board meeting of 30 September 2020 also record that "Conflicting legal advice had been received regarding the inclusion or not of the Western link in the Plan".

#### **Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24413

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Mr Andrew Cawdron [12806]**Summary:**

B) Policy 1. The GNLP should not increase the total number of dwellings beyond the necessary minimum and should not include the increase made between Regulation 18 consultations and this consultation. Is this change legal or fair? The effective contingencies include both the excess 22% buffer and windfall sites, which demonstrate that an increase to the 'minimum' is not required. Further, the Office for National Statistics in their Household Projection assessments 2018 project that 95% of household increase in the period will be 1 person or 2 person no dependant households. Suburban housing estates are the wrong solution.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24414

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Mr Andrew Cawdron [12806]**Summary:**

The GNLP should be positively prepared and should be consistent with achieving sustainable development. We do not consider the increased numbers mentioned or their location to be sustainable. There exist greater opportunities in Norwich for dwellings and reduced reliance should be placed upon new greenfield sites adjoining Towns, Key Service Centres and Village Clusters, all of which tend to become 'dormitory' estates demanding vehicular access for employment, schools or medical facilities and therefore carbon positive.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24415

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Mr Andrew Cawdron [12806]**Summary:**

The natural environment remains unprotected and aspirations for 'bio-diversity' net gain cannot be achieved by planting 100 twigs to replace a 100 year old oak. Ecology systems are time dependant and not resistant to disruptions, interruptions, sterile periods (.e.g. during construction) and later minimal, spaced at intervals, landscaping.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally** No**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24416

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Mr Andrew Cawdron [12806]**Summary:**

There should be an objective that addresses the ongoing failures to deliver 'affordable' housing. The cynical use of value assessments by developers to reduce the numbers of affordable dwellings should be resisted.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally** No**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24412

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** Mr Andrew Cawdron [12806]**Summary:**

I have the following response to the Regulation 19 consultation response, broadly relating to Paragraph 35 of the National Planning Policy Framework and the examination and soundness of Local Plans; The Plan has been published in order for representations to be made on it before submission to the Planning Inspectorate. In the absence of an 18D consultation responses have become limited to aspects of the plan being legally non-compliant or unsound. The Plan is unsound for the following reasons:-

A) Section 4 – The delivery of growth and addressing climate change. Policy 1. The GNLP should actively contribute to the mitigation of and adaptation to climate change. The GNLP should adopt policies which will reduce green house gas emissions, e.g. by reducing vehicle dependency or setting dwelling carbon target standards above those of the current Building Regulations.

J) Future Proofing the GNLP. The Plan is to provide planning policy for the period to 2038. As stated earlier in our response, we consider the lack of a proactive series of proposals to reduce the level of carbon emissions to be unsound given the gravity of the potential responses to Climate Change and the challenges to biodiversity and our surrounding ecology. The primary problem is the acceptance of the relentless level of growth, the second the acceptance of the level of private car use (which is also a major factor in air quality problems), the third is that resources continue to be stripped from exhaustible reserves and the fourth is that there is no end vision. When will the loss of growing land be seen as a grand failure to husband a precious natural resource?

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24417

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Mr Andrew Cawdron [12806]



**Summary:**

F) Policy 4 Strategic Infrastructure. There is little acknowledgement within the plan that medical facilities in Norfolk are stretched, GPs are in reduced numbers, police forces are barely coping, ambulance staff are not being reinforced and teachers are not being retained. Despite this, the stated ambitions are to increase employment numbers and add 118,000 people to the population, acknowledged to be mostly from inward migration into the County. Add the consequent increased vehicle journeys and there is no enhancement or improvement to the environment or quality of life for the existing and indeed future residents. Acres of productive farmland in one of the most climatically advantaged counties are being sacrificed and the County is acknowledged as a water stress area. The final draft of the Water Study (January 2021) demonstrates significant upgrades to waste and supply are required to match such demand. There is NO capacity for increased surface water flows, which must imply that future flooding will increase as an issue.

The Sustainability Appraisal (largely a repeat of that available at Regulation Reg18C) states that these growth aspirations will have a significantly negative impact on air, noise and light pollution to the detriment of well being (SA1) climate change (SA2) biodiversity and natural resources, waste and contaminated land (SA14).

H) Policy 4. Transport 'improvements'. The GNLP does not demonstrate how 'modal shift' from car use is to be made. For example, improvements to the 'spokes of the wheel' could be argued to be essential to this ambition and sustainability gain.

The radial roads that lead out from the centre of the City into the suburbs to allow safe cycling, walking and public transport routes require improvement. Many of these roads particularly to the North East of the City and the 'Growth Triangle' remain rural roads without footpaths or the widths for a safe cycle route. We refer to the Plumstead Road, the Salhouse Road, the Buxton Road, the North Walsham Road and the Wroxham Road as classic examples. It is however a City wide suburban challenge. The Rail Halt near the Broadland Business Park has been touted for over twenty years without any significant progress and investment and improvements to rail halts near expanding areas, Blofield/Brundall for example, should be given greater emphasis, all to reduce dependency upon the private car, van and truck.

I) Policy 4. The Norwich Western Link Road. Where resources should have been provided to existing networks as above, instead a policy has been made to provide a new dual carriageway link across the protected Wensum River Valley to link the end of the newly constructed Broadland Northway to the proposed to be dualled section of the A47. In sustainability assessment terms this is a 'major negative'. In cost terms it increases Norfolk County Council risk and long term Debt. In Climate terms it is incompatible with policy. In real need terms it has failed to be justified. It does not have planning consent. The inclusion of the NWL in the plan is therefore unsound.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24418

Object

**Section 4 - The delivery of growth and addressing climate change, 152****Respondent:** Mr Andrew Cawdron [12806]**Summary:**

There are a number of issues illustrated by this GNLP that are not sincerely addressed.

The Proposal adopts the same old philosophy to preparing the Plan. It implies acceptance of historic solutions throughout and fails to address the consequences of those solutions of which we are increasingly aware.

We know we are using more of the planetary resources than we can afford to use, so why are population growth and continued development considered acceptable, the more particularly as this plan relies upon inward migration from other parts of the UK to the detriment of other competing authorities.

We are killing the biodiversity and ecosystems of the planet for future generations by e.g. inter alia, agro-chemical warfare and excessive carbon emissions. Paying lip-service to targets without active solutions is unsustainable.

Diminishing the supply of agricultural land in a currently friendly climate area is an illogical activity. One is destroying the vital resource of soils, workability and climate possibility to provide for a concrete and profit agenda which one cannot eat.

GNLP should examine the Waste profile of our activities and include for diminishing consumerism, reducing waste from plastics, clothing, household goods and activities like building/refurbishment and place zero carbon targets on development. It is now time critical and should be formalised.

The whole ethos of the 'fringe' areas, towns and service villages is unsustainable in terms of human connectivity to work and services, as so much is no the 'beyond a good walk' limit (the NE Growth Triangle being a prime example). At three miles out from Norwich City Centre on green field sites of quality agricultural land, creating abandoned' dormitory suburbs without centres or services and all accessible only by personal transport, thereby adding to the traffic volumes. Let us consider a radical approach. Instead of presuming for further development, let us take the alternative approach, which is NOT to develop unless it can be proved that the three tenets of the NPPF (and the future of the planet) are demonstrated beyond doubt. Economic, Social and Environmental benefit must be given equal importance, with a controlling bias towards the Environment.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

24420

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Mr Andrew Cawdron [12806]

**Summary:**

The Glossary definition given in the Reg. 19 documents on page 131 is "A term mostly derived from the 1987 Brundtland Report. Interpretation varies, but typically the term means meeting economic and social goals without undermining the environment, as well as meeting needs of the present without compromising the environment for future generations. In 2015 the United Nations agreed 17 Sustainable Development Goals to be reached by 2030. The UK is amongst the countries leading the delivery of the Sustainable Development Goals."

Also note the context of the more up to date 2019 NPPF Section 15 requires that policies and decisions should contribute to and enhance the natural and local environment.

Changes to the NPPF in the current Government public consultation go further in proposing changes to paragraph 11 a) that "all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects" replacing the emphasis in the current NPPF that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

Reg. 19 Policy 3 places environmental protection and enhancement onto individual development proposals, but adds an overriding dominant factor of benefits and minimising harm, (without explanation of what is considered to be a benefit).

There are two specific policies in the GNLP relating to enhancement of the environment namely:

- At least 10% net biodiversity gain (on or off site).
- Addressing the potential detrimental impact of visitor pressure caused by residents on sites protected under the Habitats Regulations, "by the payment of a contribution towards the cost of mitigation measures at the protected sites (as determined under the Norfolk Green infrastructure and Recreational Impact Avoidance and Mitigation Strategy, plus an allowance for inflation); and the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of the residents as an alternative to visiting the protected sites. This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard.

The above reference to Natural England Accessible Natural Greenspace Standard does not mention the remainder of the quoted section namely;

- no person should live more than 300m from their nearest area of natural green space;
- there should be at least one accessible 20ha site within 2km from home;
- there should be one accessible 100ha site within 5km;
- there should be one accessible 500ha site within 10km.

The purpose of this model is to guide local authorities in identifying the current level of provision of accessible natural green space and to assist with the setting of local standards and targets. The GNLP fails in its assessment of how the current environment equates to these standards nor provides any plans for any rebalance necessary.

The government study in 2011 of areas noted the classification of the three districts comprising Greater Norwich as: Norwich - Urban: Broadland - Urban with significantly rural: South Norfolk – Mainly rural

The present GNLP collects the different geographical classifications into a single entity with a single sustainability policy which risks losing much of the rural classification. The sustainability of the environment is inadequate in the plan in consideration of the diverse nature across the 3 districts and the equal standing given to the environment in the NPPF to those of economic and social objectives.

Concerning biodiversity the study states "Biodiversity Net Gain (BNG) will still require the application of the mitigation hierarchy to avoid, mitigate or compensate for biodiversity losses on any sites within the GNLP. BNG will operate in addition to these approaches, with the aim of ensuring that definite improvements to biodiversity are delivered. "

Avoidance of biodiversity harm should be the principle consideration before deciding whether mitigation is acceptable.

Clarity is required in the GNLP that biodiversity net gain will be implemented in the locality of and appropriate to each development. It is unacceptable to degrade the environment of any area on the assumption that another will be improved as compensation. Clarity is also required as to the continued maintenance or management of these green space areas.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

Legally No

compliant:

Sound: No

Comply with Not specified

duty:

Appear exam: Appearance at the examination

Attachments: Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

## 24421

## Object

### Economy, 131

Respondent: Mr Andrew Cawdron [12806]

#### Summary:

Returning to the 22% - 31 % buffer over provision, it is evident that any excess house building above need will slow the path to zero carbon. Climate change reduction locally, nationally and globally should be of primary overriding consideration, but the implications of over provision of land for this internationally agreed necessity is not addressed in the draft Reg. 19.

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: "development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of and adaptation to, climate change".

The vision of the GNLP includes the statement at paragraph 131 that "our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national zero emission target by 2050." Where is the evidence of this? Whilst the GNLP Climate Change Statement states that it will "have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks", it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations .

There is no mention of the December 2020 target announced by the Government for a carbon emissions reduction of at least 68% by 2030 compared to 1990 levels.

Carbon emission reductions for the three Authorities from 2005 to 2018 (UK local authority and regional carbon dioxide emissions national statistics: 2005-2018) were:

Broadland - 23% reduction (1.77% average annually)

Norwich - 42% reduction (3.23% average annually)

South Norfolk - 20% reduction ( 1.54% average annually)

The data from 2005 would suggest that Broadland and South Norfolk will need to accelerate the speed of reduction to 2030 if they are to meet this Government target.

It is acknowledged that rural areas have higher levels of emissions than the national average which may require stricter measures and which should be addressed in the plan. Both Broadland and South Norfolk have recorded slight increases in carbon emissions between 2005 and 2018 for transport. Transport emissions are a critical area which needs to be addressed, particularly noting that transport is 36% and 53% of the total emissions for Broadland and South Norfolk respectively against the national average of 36%.

There are no specific proposals in the GNLP outlining how this carbon emissions imbalance from transport will be resolved or that levels will not be further increased by the location proposals for housing and employment in the plan. It is inevitable that the site allocations will increase transport use rather than encourage a modal shift to other forms of transport as is the stated ambition of the GNLP.

Reliance on the switch to electric vehicles for transport emission reductions will assist over the longer term, but this will still be partial up to 2030 . Volumetrically, housing placement on GNLP sites will lead to larger traffic quantity and pressure on all county road infrastructure.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

**24422****Object****Policy 5 Homes, 271**

**Respondent:** Mr Andrew Cawdron [12806]

**Summary:**

The Affordable Housing Need is stated at paragraph 27 I of Reg. 19 v 1.7 as 11,030 being 28% of the overall housing need as established in the 2017 SHMA Report. Assuming the affordable housing percentages will apply to the 22% buffer of allocations above the defined overall housing need, mathematics determines that the number of affordable housing units will exceed the need by 2,427 if all the sites are developed over the period.

The Plan does not indicate the reduced number of affordable homes which will result from the reductions in Neighbourhood plans and committed sites with approved lower percentages of affordable housing.

All this data should be readily available to the GNDDP and the plan should show the numbers of affordable houses which will be provided against this policy for meeting the overall housing need target and how this will be managed in scenarios where the overall need is not being met and if annual completions are nearer to the target including the 22% buffer.

Without this study comparing potential extra affordable homes if the buffer is built out and reductions from Neighbourhood plans and lower approved numbers in existing commitments, the policy on affordable homes is meaningless.

**Change suggested by respondent:**

A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Mr Cawdron scanned representation (redacted) - <https://oc2connect.gnlp.org.uk/a/4gm>

**23916****Object****Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes**

**Respondent:** Chapelfield GP Limited c/o LaSalle Investment Management [20040]

**Agent:** Savills (UK) Ltd (Matthew Sobic, Director) [19966]

**Petition:** 2 petitioners

**Summary:**

It is not considered that the policies reflect the requirements of the National Planning Policy Framework ('NPPF') and Planning Practice Guidance ('PPG'), or the objectives of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 ('UCO').

3.1 The representations on the emerging Plan cover the following points:

1. The requirement to provide a flexible approach to enable City Centres to grow and diversify to enable them to respond to rapid changes in commercial property markets.
2. The requirement to ensure that policies in the emerging Plan are reflective of national legislation.
3. The requirement to ensure the development plan when taken as a whole including existing documents covering the Greater Norwich area are consistent.

3.2 The representations set out below suggest amendments to the emerging Plan in order to ensure its consistency with national policy and the regulatory framework enacted by Government over the last year. Importantly, the amendments suggested below support the objective that the policies are seeking to achieve in terms of supporting the vitality and viability of centres.

3.3 The representations relate exclusively to Policy 7.1 that provides the emerging policy in relation to ensure the vitality and viability of centres.

**Change suggested by respondent:**

3.11 With the above in mind, Policy 7.1 starts by providing a positive approach to ensure flexibility, but then provides a restrictive approach that does not support Chantry Place, a pivotal location in the City Centre, in being able to expand and diversify in terms of City Centre uses. This restrictive approach is to the detriment of Chantry Place being able to contribute positively to the City Centre's vitality and viability. The restrictive nature that the emerging Plan takes to delivering leisure uses within the City Centre at locations such as Chantry Place is therefore in conflict with objectives to ensure the vitality and viability of the City Centre.

3.13 Firstly, Chantry Place is located outside of the defined leisure area, which is defined by the Norwich Local Plan Policies Map, adopted December 2014. Therefore, Chantry Place is penalised by emerging Policy 7.1 as it is not in a location where leisure uses are promoted, and further where applications for them are submitted at locations such as Chantry Place, support for them does not exist as an applicant must demonstrate that there are no alternative locations within the defined leisure area (i.e. the sequential approach). This creates an environment where Chantry Place is treated as an 'out-of-centre' location, yet located within the City Centre. Such an approach would be inconsistent with the requirements of Paragraph 85 of the NPPF, and the definitions of edge and out of centre locations at Annex 2 of the NPPF and the subsequent policy requirements for those locations. The approach is not consistent with the positive strategy required to in-centre locations as part of either Parts (a) or (b) of Paragraph 85 of the NPPF. Policy 7.1 as drafted is therefore not consistent with national policy.

3.14 Therefore, either the Policy should be expanded to support leisure uses within all areas of the City Centre, or the definition of the areas where leisure use are supported should include Chantry Place and any other similar locations within the City Centre. Such an approach would ensure Policy 7.1 is consistent with the NPPF.

See Attachment for full details

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/474>

24087

Object

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**Loddon and Chedgrave, Settlement Map****Respondent:** Chedgrave Parish Council (Ms Hayley Goldson, Clerk) [14322]**Summary:**

Chedgrave Parish Council considered this matter at its meeting of 4th March 2021 and the council concluded that: "The whole Section 18/19 process had been inadequate for the purposes of the general public being involved".

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24175

Object

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**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development****Respondent:** Christchurch Holland [20055]**Agent:** Sequence (UK) Ltd (Mr Graham Bloomfield, Land & Planning Partner) [19983]**Petition:** 2 petitioners

**Summary:**

Sequence broadly supports the purpose of draft Policy 7.5 Small Scale Windfall Housing Development to permit small-scale residential development adjacent to Settlement Boundaries or within or adjacent to a recognised group of dwellings.

However Sequence consider that the policy as currently worded is not sound as it is not justified as an appropriate strategy (National Planning Policy Framework (NPPF) paragraph 39b) or effective (paragraph 39c). Bullet point 1 of draft Policy 7.5 restricts cumulative development to 3 or 5 dwellings (dependent on the size of the Parish), over the plan period.

Sequence are concerned that this will raise significant challenges with the implementation of Policy 7.5. By limiting the amount of development over the plan period, this creates a 'first past the post' system for windfall development in a Parish, which will artificially restrict the ability for sustainable development to come forward.

On the one hand, the policy establishes that the Settlement Boundaries are not immutable. However on the other hand, in effect, once the limit of 3-5 dwellings has been met within a Parish; development that is otherwise in accordance with Policy 7.5 and sustainable in all other respects, would be refused due to previous small-scale development having already been consented. This also takes no account of the comparative merits of development proposals and sites - simply once the artificial limit has been met, any subsequent applications would be contrary to the policy as currently drafted.

Sequence are also concerned that Policy 7.5 as currently drafted will have unintended consequences whereby a number of competing schemes may be submitted in any one Parish creating challenges for Development Management and comparisons made between sites rather than judging each site on its merits and in accordance with the Local Plan.

Sequence therefore contend that this is not an appropriate strategy, and accordingly, it is not justified, nor effective, and is not sound.



**Change suggested by respondent:**

The main revision should be to bullet point 1 of Policy 7.5 so that the restriction on development over the plan period is lifted. However Sequence recognise that the aspiration of the policy is for small-scale windfall development and, therefore, that each development is restricted to 3 or 5 new homes dependant on the size of the Parish.

In addition it is noted that Policy 7.5 uses the reference 'Development Boundary' rather than 'Settlement Boundary', inconsistent with its use elsewhere within the Draft Strategy and the Part 2 Pre-Submission Draft Sites Plan.

Sequence therefore respectfully suggest that the wording of the policy is updated as follows:-

**'POLICY 7.5 – SMALL SCALE WINDFALL HOUSING DEVELOPMENT**

Small scale residential development will be permitted adjacent to a settlement boundary or on sites within or adjacent to a recognisable group of dwellings where:

- Development permitted under this policy will be no more than 3 dwellings in small parishes or 5 dwellings in larger parishes (as defined in appendix 7); and
- The proposal respects the form and character of the settlement; and
- The proposal would result in no adverse impact on the landscape and natural environment; and
- The proposal accords with other relevant Local Plan policies

Positive consideration will be given to self and custom build.'

The revision from Development Boundary to Settlement Boundary will resolve this inconsistency and prevent any confusion.

The revision to bullet point 1 will see an appropriate strategy for windfall sites to be delivered and accordingly a justified and sound approach with planning applications brought forward under this policy considered on their merits and not artificially restricted due to previous or competing proposals. This will also allow for quicker delivery of small sites to meet housing need in accordance with Policy 68 of the NPPF.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 2021.03.22.Site\_Location\_Plan.jpg - <https://oc2connect.gnlp.org.uk/a/4vy>  
 2021.02.12.Settlement\_Boundary\_Option2.jpg - <https://oc2connect.gnlp.org.uk/a/4vp>  
 2021.02.12.Settlement\_Boundary\_Option1.jpg - <https://oc2connect.gnlp.org.uk/a/4vq>  
 2021.03.22.SitesPlan.ContinuationSheet.V2.FinalSubmission.pdf - <https://oc2connect.gnlp.org.uk/a/4br>

## 24176

## Object

**Redenhall with Harleston, Settlement Map**

**Respondent:** Christchurch Holland [20055]

**Agent:** Sequence (UK) Ltd (Mr Graham Bloomfield, Land & Planning Partner) [19983]

**Petition:** 2 petitioners

**Summary:**

Sequence consider that the Draft Sites Plan for Redenhall with Harleston is not 'sound ' as the approach is not justified or effective under paragraph 35, part b of the National Planning Policy Framework (NPPF).

Specifically Sequence consider that the position of the Settlement Boundary is not an appropriate strategy taking into account the reasonable alternatives.

The Redenhall with Harleston proposals map demonstrates an inconsistent approach to the inclusion of land within the Settlement Boundary. Employment allocation HAR7 is included within the Settlement Boundary, notwithstanding that it is an undeveloped site. However, by contrast housing allocation GNLP 2106 and mixed use allocation GN2136 are not included within the Settlement Boundary.

Sequence consider that this inconsistent approach is not sound as it not justified as an appropriate strategy. Sequence contend that the reasonable alternative is to include all proposed allocations within the Settlement Boundary as a consistent approach.

A suggested alternative to the Settlement Boundary is shown on the enclosed plan (drawing reference: 2021.02.12.Settlement\_Boundary\_Option1).

(continued..... see continuation sheet)

**Change suggested by respondent:**

Sequence consider that the Settlement Boundary for the Redenhall with Harleston Policy Map should be redrawn to include draft allocations GNLP2108 and GNLP2136 to provide a robust and defensible boundary to the A143 that will endure over the plan period as well as a more coherent connection to the Settlement Boundary to the west of GNLP2108. These suggested revisions are shown on the enclosed drawing reference 2021.02.12.Settlement\_Boundary\_Option1.

This revision will ensure a sound and justified approach. The current approach is not justified, as it is not an appropriate strategy given the inconsistent treatment of the draft allocations in terms of their location within the Settlement Boundary and the contrived nature of the current drafting. The revisions shown on drawing reference 2021.02.12.Settlement\_Boundary\_Option1 will deliver an appropriate strategy.

The revisions shown on drawing reference 2021.02.12.Settlement\_Boundary\_Option1 will deliver an appropriate strategy with respect to the Redenhall with Harleston Draft Sites Plan but similar revisions will need to be made to other Part 2 Draft Sites Plans to ensure the plan is sound overall given the current inconsistencies throughout.

An alternative proposal has also been put forward on drawing reference 2021.02.12.Settlement\_Boundary\_Option2. This will specifically address the drafting of the Settlement Boundary to the west of GNLP2108, which is illogical and therefore not an appropriate strategy. Redrafting the Settlement Boundary as shown on drawing ref: 2021.02.12.Settlement\_Boundary\_Option2 will see a sound and justified approach.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** 2021.03.22.Site\_Location\_Plan.jpg - <https://oc2connect.gnlp.org.uk/a/4vy>  
2021.02.12.Settlement\_Boundary\_Option2.jpg - <https://oc2connect.gnlp.org.uk/a/4vp>  
2021.02.12.Settlement\_Boundary\_Option1.jpg - <https://oc2connect.gnlp.org.uk/a/4vq>  
2021.03.22.SitesPlan.ContinuationSheet.V2.FinalSubmission.pdf -  
<https://oc2connect.gnlp.org.uk/a/4br>

23455

Support

**Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets****Respondent:** Mr Stuart Clancy [19872]**Summary:**

GNLP0062, GNLP0457, GNLP2051, GNLP2106

I seek assurances from the GNLP team that although the above sites are deemed based on the stage 1-7 assessment process "unreasonable sites". Could you confirm that they or any other sites within the Wensum Valley will be classified as suitable for development unclear any current planning process.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24054

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Clarion Housing Group [19923]**Agent:** Brown & Co (Mr Paul Clarke, Associate Partner) [12840]**Petition:** 2 petitioners**Summary:**

See attachment for full representation.

4.1 The GNLP in its current form is not considered to be sound as the strategy fails to adequately deliver on the overall purpose of the plan, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft GNLP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, however it seeks to deliver growth through a traditional delivery model which perpetuates inherently inefficient, unsustainable, and uninspiring development. 4.2 Additionally, the strategy is considered to be ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period, with some sites having been originally allocated in previous iterations of the Local Plan, dating as far back as 2004. Continuing to roll forward sites which have failed to deliver in line with the housing trajectory places the strategy for growth at risk and undermines the Plan led approach. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period, with a number of sites having no promoter or developer on board.

**Change suggested by respondent:**

4.3 A new settlement at Honingham Thorpe, GNLP4015A-G, would offer the opportunity to provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that new garden settlements can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares. Provision of a Country park, with enhanced provision to the Wensum and river valley, would create a significant area of green space, something which has become more important than ever in light of the pandemic. The relationship of the site with the Food Enterprise Park would support a key growth area and the emerging agri-tech corridor, creating a holistic and mutually supportive relationship between the new community, the Food Enterprise Park, Easton College, Norwich Research Park and the UEA.

4.4 As the country's largest housing association and a registered charity, Clarion have an exemplary record for quality, social and environmental responsibility, delivery at scale and an unrivalled commitment to legacy, stewardship, and community issues. They recognise that quality and social purpose must be at the heart of development, and that the opportunity to develop on a large scale brings with it both dedicated to delivering an exemplar settlement which embodies the traditional Norfolk settlement, supports the region's world-renowned Agri-Tech corridor, considers the UK's commitment to reduce carbon emissions to net zero by 2050, helping to place the area at the forefront of the transition to a post carbon economy.

4.5 Clarion support the aims of the GNLP to provide better places, with multi-functional green spaces seeking to enhance the landscape, biodiversity, and connectivity, as well as the draft policy requirements for water conservation, energy efficiency, and decentralised energy generation as a means of contributing to national targets for carbon neutrality. However, the proposed carrying forward of allocations and concentration of growth to existing urban areas is considered to be misaligned with the aspirations of the Greater Norwich Local Plan, particularly in the context of Norwich City Council having declared a climate emergency and pledging to be carbon neutral by 2030, and the national target of 2050. Such an approach is considered to fail to adequately adapt to the changing circumstances and priorities of the Greater Norwich area, and beyond.

See attachment for full representation

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/486>

23642

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Clarion Housing Group [19923]**Agent:** Brown & Co (Mr Paul Clarke, Associate Partner) [12840]**Summary:**

It is considered that the proposed strategy is not appropriate and is incompatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change, and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. Furthermore, the proposed strategy is not considered suitable to deliver beautiful places or spaces.

**Change suggested by respondent:**

It is thought that sites GNLP0415A-G, collectively known as Honingham Thorpe, offer an appropriate opportunity to deliver growth differently, creating a truly sustainable community which paves the way for the region to become the UK leader in clean growth whilst raising the standards for design and placemaking.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** 20210318 Regulation 19 Representations.pdf - <https://oc2connect.gnlp.org.uk/a/45x>

23740

Object

**Aylsham, Settlement Map****Respondent:** Gordon Clarke [19904]**Summary:**

The Settlement Map is inaccurate  
It includes reference to Plot GNLP 0596 R  
This was not considered in Regulation 18

**Change suggested by respondent:**

The Settlement Map should be republished with only the Regulation 18 site included  
This comprises 3 elements ; GNLP 3011 , 0595 , 2060

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23745

Object

**Aylsham, 4.5****Respondent:** Gordon Clarke [19904]**Summary:**

Statement is inaccurate

1 : Allocation is for 250 - Plot Ref GNLP 0595 , as laid out in Reg 18 , Stage C , 29 Jan &gt; 16 Mar 20

2 : Plot GNLP now includes 0311 and 2060

**Change suggested by respondent:**

Statement revised ; for 250 , not 550 dwellings allocated to GNLP 0595

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** None

23747

Object

**Aylsham, 4.3****Respondent:** Gordon Clarke [19904]**Summary:**

Statement is not specific and is incomplete

**Change suggested by respondent:**

Aylsham Neighbourhood Plan is a formally adopted set of guidelines , following local referendum , in 2019. This plan sets out five distinct sets of guidelines .

Cittaslow should also be included , as an influential internationally recognised organisation , which is an integral part of Aylsham's development for the future . Aylsham is the only Cittaslow Town in England , and one of three in UK .

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** None

23739

Object

**Aylsham, 4.2****Respondent:** Gordon Clarke [19904]**Summary:**

Accuracy and completeness of information provided does not form a complete dataset for those not connected with the Town to make value decisions about its future

**Change suggested by respondent:**

- 1 - Market Place : provides open space for community events ; essential limited parking to access all the core businesses of the town
- 2 - River Bure : Flows from the North turning East towards Burgh ; It is the North geographical boundary of the main town , with Dunkirk settlement on the North bank
- 3 - Woodgate Farm scheme : known as " Willow Park "
- 4 - Defining the built edges of Aylsham : B1145 and A140 do define the boundary to SW , S and E respectively . More significant is the Grade 2 Agricultural Land - as stated in Regulation 18 , Section 3.3 , page 18 of 330 - which is immediately beyond these roads

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23748

Object

**Aylsham, 4.1****Respondent:** Gordon Clarke [19904]**Summary:**

Formal inclusion of site which was not included for consideration in Regulation 18 , Stage C , 29 Jan > 16 Mar 20  
It was identified as a site , along with GNLP 0336 - but crucially , not highlighted  
Therefore , New Allocation of 250 , not 550 should be the statement

**Change suggested by respondent:**

GNLP 0596R to be removed from Regulation 19

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23749

Object

**Aylsham, 4.4****Respondent:** Gordon Clarke [19904]**Summary:**

- 1 : Inaccurate statement : Regulation 18 , Stage C , 29 Jan > 16 Mar 20 only identified [ in Red ]
- 2 : Lack of evidence in the text that sufficient inclusion and reference of national planning guidance has been followed ; NPPF 2012 , Amended 2019 ; this would include cooperation with local stakeholders , vitality of town centres , enhancing historical environment , safe communities , effective use of land , well designed places , traffic , climate change and crucially - sustainability in the widest context

**Change suggested by respondent:**

Detailed text to demonstrate that all the planning guidelines have been considered and specific examples of these considerations .

There is no recognition of Aylsham's current status . This s based upon the proposed 779 dwellings . This represents 22% increase in ' capacity . This may be in line with national guidelines / requirement's , but has no regard for the physical capacity of Aylsham Town ; amongst the most important include , traffic / pedestrian network , schools , infrastructure ( Infrastructure comprises ; water supply , disposal / runoff ; broadband / communications ; power ; street lighting ; road network ; junction layouts ; pedestrian network ; cycle network ; parking ; public transport ; business access )

A basic Timeline would give some initial guidance . In what sequence the additional developments .

No mention of whether Primary school is in addition to or replacement .

On the basis Regulation 19 = 779 dwelling's

779 ( 550 + 229 dwellings ( carried forward ) ) :

Homes ; 2020 @ 3,612 ; so we will have ~ 22% increase in dwellings ;

(( 3612 + 779 ) / 3612 ) -1

Population ; with average of 2 people , equivalent to 1558 . This represents a ~ 18 % increase above the 8,567 current population [mid-2019 ; also includes the Ward of Marsham ]

(( 8567 + 1558 ) / 8567 ) -1

Example of infrastructure ; water

Requirement ; @ min norm for Europe 120 litres / person / day ; requirement would be

1558 \* 120 \* 365 = 68,240,400 litres / year

Waste ; deemed at ~ 90% of water consumption , would imply that the current treatment facility would need additional residential capacity for ~ 61,416,360 litres of effluent /

year .

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

24407

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]**Summary:**

Since the Regulation 18 consultation, the UK Climate Change Committee (CCC) has issued a standalone report providing recommended actions for local authorities, with a view to enabling the achievement of the 6th Carbon Budget and the 2050 net zero target. (<https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>) The report



includes a number of specific recommendations in respect of local planning policy, which they say should “lay the foundations towards net zero”. The CCC advises that:

☒ “Net Zero housing and commercial developments, connected to sustainable transport infrastructure, walking and cycling and public transport need to become the norm, not the exception”, and

☒ “[n]ew planning policy needs to align more widely with spatial planning for sustainable transport and energy systems – to support decarbonised heat as a norm – based on appropriately sited, highly energy efficient buildings.” In this context, they further advise: “Zero carbon developments avoid future retrofit costs for councils, landlords and residents. ... Local planning authorities currently developing Local Plans should gather evidence to support policies that require developments to exceed current building standards. This should include evidence that shows that higher energy performance and low-carbon heating systems will add value to the sale or rental price and reduce energy costs for householders. This evidence can feed into the determination of the value of the development. ... Local Plans and Transport Plans should deliver modal shift from cars to walking, cycling and public transport. New developments should prioritise walking and cycling infrastructure at the masterplanning stage and should be well-linked to viable public transport routes. Planning policy can set maximum (rather than minimum) car parking spaces for developments or even car-free development. ... Constraining the growth in vehicle mileage is vital to reducing emissions, even as EVs replace petrol and diesel cars. Car and van mileage can be reduced by 7-16% by 2030 and 12-34% by 2050 against today’s levels. There should be: ... Shifting 33-35% of trips to walking, cycling and public transport such as shorter trips, for cities this can be higher ... Local Plans should support renewable energy and low-carbon heat. Local Planning Authorities should review Local Plans. These should include an energy policy that takes a positive and proactive approach to renewable energy generation and storage. ... Local authorities should include new onshore wind in discussions with communities about climate change and land-use planning.”

The Norfolk Strategic Planning Member Forum (NSPMF), of which the Greater Norwich authorities are part, has also recently issued a research paper on ‘climate change and the planning system’.(<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>) The paper includes a number of recommendations regarding plan-making:

☒ On the overall approach: “Action on climate change should be an integral part of the culture of plan-making and should be embedded and integrated in policy preparation. ... Local Planning Authorities are therefore likely to need to evaluate planning applications through a climate change lens and ensure future local plans clearly set out the decision-making framework, with particular emphasis on the following, for example:

- o Placing more emphasis on co-locating uses and planning development near public transport links to reduce car travel.
- o Setting more ambitious targets on energy efficiency in buildings.
- o Encouraging the greater use of renewable energy.
- o Embedding and prioritising climate change in local plan-making and when determining planning applications, including ensuring resilience to climate impacts such as flooding.
- o Requiring travel plans with increased sustainable transport obligations - prioritising walking, cycling and public transport over reliance on the car.
- o Increasingly plan and help facilitate for the switch to electrified transport.”

☒ On co-benefits: “It is important to be aware that whilst these recommendations relating to topic areas may address climate change adaptation and mitigation, or sequestration of greenhouse gases, that is not the only benefit. It is often wise to do what is recommended, regardless of climate change, because of the many other benefits of which doing so brings. The elements of climate change are also woven into many policy areas with much cross-over, e.g. growth distribution, transport policies, environmental policies as well as specific policies on adaptation and mitigation as all have a role to play in addressing Climate change. For example:

- o Walking and cycling rather than driving a motor vehicle can reduce greenhouse gas emissions from burning fuel. Adopting a more active lifestyle can lead to improved health and well-being as well as saving individuals money.
- o An energy efficient home requires less energy and therefore reduces the amount of emissions associated with producing energy, but it also reduces money a household or business spends on energy bills.
- o Green infrastructure can help sequester carbon dioxide but it can also help biodiversity and increase access to the countryside and other greenspaces, which can in turn support mental and physical well-being.
- o Tackling climate change is part of facilitating and enabling clean growth. It can help economic recovery and provide job opportunities such as retrofitting of properties, technology development e.g., EVs and electrification of transport and the renewable energy sector.”

☒ On sustainable travel: “Local planning authorities should consider the following through appropriate plans, policies and processes: Better alignment of plans and decisions with identified local and national strategic infrastructure priorities for walking and cycling. Ensure proposals seek enhanced connectivity to open space and seek to provide connections to, enhancement and maintenance of nearby existing walking and cycling networks. ... The aim is to better promote active forms of travel, particularly walking and cycling to reduce unnecessary car use. Evidence clearly points to shorter trips (i.e. 1-5 miles) where walking and cycling can most effectively increase, and conversely reduce, travel by private car. There needs to be a much more joined up approach, with more collaboration and clear advice on how to realise the multiple aspirations. ... Car Free Housing policies: Transport is now the biggest contributor to carbon emissions in the UK and within this sector, passenger cars are by far the biggest contributor. It is clear from the Department for Transport’s research that a modal shift away from the private passenger car would have the most significant impact in reducing greenhouse gases, such an approach could be encouraged through planning policy.”

☒ On sustainability appraisal: “Strong/prominent climate change objectives in the Sustainability Appraisal and Local Plan ... These policies are then assessed against sustainability appraisal objectives whereby potential positives are maximised and any negative effects identified mitigated.”

☒ On national planning reforms: “[W]hilst changes may well be made to the planning system in future, recommendations within the report are relevant for the current local plans in production and could be ‘in the meantime’ policy approaches – in place until the national system is changed.”

However, despite the Greater Norwich and other NSPMF authorities having committed to implementing these recommendations, they do not appear to be reflected in the current draft of the Greater Norwich plan. In addition to the issues previously raised at the Regulation 18 stage, we have identified the following matters that suggest a failure to comply with the applicable statutory and policy requirements.

#### 1. Energy efficiency

We have explained that a zero carbon standard must be the starting point that is worked back from to the extent that any viability constraints are identified. Where there are viability constraints affecting a particular category of dwelling or scale of development, then standards should be reduced for that category or development size only, avoiding a ‘lowest common denominator’ approach. This approach is required to meet the applicable statutory and policy requirements and to ensure that the plan supports delivery of the net zero target. Since our response, the government has confirmed the important role that local authorities have in supporting national climate policy when maintaining local authorities’ powers to set local energy efficiency standards.

However, the final Viability Appraisal dated 15 December 2020 simply asserts (at paragraph 108) that “[t]he majority of the comments noted are considered to be valid aspirational points however, given the nature of these notional Typologies it is not feasible to go into the level of cost detail as suggested.”

This failure to consider more ambitious standards is all the more unjustified given (i) the new viability exception that has been introduced into Policy 2,6 and (ii) that the government’s proposed uplift in national standards will deliver a higher reduction in emissions against current standards (of 31%) than proposed in the plan (19%), with the uplift expected to take effect from June 2022.<sup>7</sup>

Moreover, the proposed cost of £5,000 is supported (at para 111 of the Viability Appraisal) on the basis that it is close to the figure of £4,847 used in the government’s Future Homes Standard consultation – however, this figure relates to a 31% emissions reduction against current standards, not a 19% emission reduction as proposed in the plan.<sup>8</sup> Indeed, the cost of a 20% reduction in emissions is assessed at £2,557 – i.e. roughly half the cost used in the Viability Appraisal.<sup>9</sup> There would therefore appear to be scope to go significantly further than is currently proposed in the plan.

#### 2. Wind energy

The plan continues to fail to scope and designate areas suitable for wind energy, as confirmed by the terms of Policy 2.10 The plan seeks to justify this approach on the basis that the NPPF “requires a positive approach to large scale renewable energy generation except for onshore wind energy development” (emphasis added), and that “no suitable sites for onshore wind energy development have been submitted to the GNLP”. Instead, the plan proposes to leave the designation of areas suitable for wind energy to neighbourhood plans.

However, this fundamentally misunderstands the requirements of the NPPF on this issue: local plans are required to “provide a positive strategy for energy from these sources, that maximises the potential for suitable development” in respect of all forms of renewable and low carbon energy and heat (NPPF, para 151). The requirement (in footnote 49 of the NPPF) for wind energy applications to fall within “an area identified as suitable for wind energy development in the development plan” only underscores the need for the plan to proactively scope and identify suitable areas, so as to

“maximise the potential for suitable development” (emphasis added).

#### Change suggested by respondent:

In preparing the submission version of the plan, we urge you to address fully all of the above issues, as well as those raised at the Regulation 18 stage, to ensure that the plan complies with the applicable statutory and policy requirements.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Full submission - <https://oc2connect.gnlp.org.uk/a/4fg>

## 24408

## Object

### Site Assessment Booklets and Studies, Sustainability Appraisal Report

**Respondent:** ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]

#### Summary:

Since the Regulation 18 consultation, the UK Climate Change Committee (CCC) has issued a standalone report providing recommended actions for local authorities, with a view to enabling the achievement of the 6th Carbon Budget and the 2050 net zero target. (<https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>) The report includes a number of specific recommendations in respect of local planning policy, which they say should “lay the foundations towards net zero”. The CCC advises that:

☒ “Net Zero housing and commercial developments, connected to sustainable transport infrastructure, walking and cycling and public transport need to become the norm, not the exception”, and

☒ “[n]ew planning policy needs to align more widely with spatial planning for sustainable transport and energy systems – to support decarbonised heat as a norm – based on appropriately sited, highly energy efficient buildings.” In this context, they further advise: “Zero carbon developments avoid future retrofit costs for councils, landlords and residents. ... Local planning authorities currently developing Local Plans should gather evidence to support policies that require developments to exceed current building standards. This should include evidence that shows that higher energy performance and low-carbon heating systems will add value to the sale or rental price and reduce energy costs for householders. This evidence can feed into the determination of the value of the development. ... Local Plans and Transport Plans should deliver modal shift from cars to walking, cycling and public transport. New developments should prioritise walking and cycling infrastructure at the masterplanning stage and should be well-linked to viable public transport routes. Planning policy can set maximum (rather than minimum) car parking spaces for developments or even car-free development. ... Constraining the growth in vehicle mileage is vital to reducing emissions, even as EVs replace petrol and diesel cars. Car and van mileage can be reduced by 7-16% by 2030 and 12-34% by 2050 against today’s levels. There should be: ... Shifting 33-35% of trips to walking, cycling and public transport such as shorter trips, for cities this can be higher ... Local Plans should support renewable energy and low-carbon heat. Local Planning Authorities should review Local Plans. These should include an energy policy that takes a positive and proactive approach to renewable energy generation and storage. ... Local authorities should include new onshore wind in discussions with communities about climate change and land-use planning.”

The Norfolk Strategic Planning Member Forum (NSPMF), of which the Greater Norwich authorities are part, has also recently issued a research paper on ‘climate change and the planning system’. (<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>) The paper includes a number of recommendations regarding plan-making:

☒ On the overall approach: “Action on climate change should be an integral part of the culture of plan-making and should be embedded and integrated in policy preparation. ... Local Planning Authorities are therefore likely to need to evaluate planning applications through a climate change lens and ensure future local plans clearly set out the decision-making framework, with particular emphasis on the following, for example:

- o Placing more emphasis on co-locating uses and planning development near public transport links to reduce car travel.

- o Setting more ambitious targets on energy efficiency in buildings.
  - o Encouraging the greater use of renewable energy.
  - o Embedding and prioritising climate change in local plan-making and when determining planning applications, including ensuring resilience to climate impacts such as flooding.
  - o Requiring travel plans with increased sustainable transport obligations - prioritising walking, cycling and public transport over reliance on the car.
  - o Increasingly plan and help facilitate for the switch to electrified transport.”
- ☒ On co-benefits: “It is important to be aware that whilst these recommendations relating to topic areas may address climate change adaptation and mitigation, or sequestration of greenhouse gases, that is not the only benefit. It is often wise to do what is recommended, regardless of climate change, because of the many other benefits of which doing so brings. The elements of climate change are also woven into many policy areas with much cross-over, e.g. growth distribution, transport policies, environmental policies as well as specific policies on adaptation and mitigation as all have a role to play in addressing Climate change. For example:
- o Walking and cycling rather than driving a motor vehicle can reduce greenhouse gas emissions from burning fuel. Adopting a more active lifestyle can lead to improved health and well-being as well as saving individuals money.
  - o An energy efficient home requires less energy and therefore reduces the amount of emissions associated with producing energy, but it also reduces money a household or business spends on energy bills.
  - o Green infrastructure can help sequester carbon dioxide but it can also help biodiversity and increase access to the countryside and other greenspaces, which can in turn support mental and physical well-being.
  - o Tackling climate change is part of facilitating and enabling clean growth. It can help economic recovery and provide job opportunities such as retrofitting of properties, technology development e.g., EVs and electrification of transport and the renewable energy sector.”
- ☒ On sustainable travel: “Local planning authorities should consider the following through appropriate plans, policies and processes: Better alignment of plans and decisions with identified local and national strategic infrastructure priorities for walking and cycling. Ensure proposals seek enhanced connectivity to open space and seek to provide connections to, enhancement and maintenance of nearby existing walking and cycling networks. ... The aim is to better promote active forms of travel, particularly walking and cycling to reduce unnecessary car use. Evidence clearly points to shorter trips (i.e. 1-5 miles) where walking and cycling can most effectively increase, and conversely reduce, travel by private car. There needs to be a much more joined up approach, with more collaboration and clear advice on how to realise the multiple aspirations. ... Car Free Housing policies: Transport is now the biggest contributor to carbon emissions in the UK and within this sector, passenger cars are by far the biggest contributor. It is clear from the Department for Transport’s research that a modal shift away from the private passenger car would have the most significant impact in reducing greenhouse gases, such an approach could be encouraged through planning policy.”
- ☒ On sustainability appraisal: “Strong/prominent climate change objectives in the Sustainability Appraisal and Local Plan ... These policies are then assessed against sustainability appraisal objectives whereby potential positives are maximised and any negative effects identified mitigated.”
- ☒ On national planning reforms: “[W]hilst changes may well be made to the planning system in future, recommendations within the report are relevant for the current local plans in production and could be ‘in the meantime’ policy approaches – in place until the national system is changed.”

However, despite the Greater Norwich and other NSPMF authorities having committed to implementing these recommendations, they do not appear to be reflected in the current draft of the Greater Norwich plan. In addition to the issues previously raised at the Regulation 18 stage, we have identified the following matters that suggest a failure to comply with the applicable statutory and policy requirements.

In response to the previous criticisms of the approach taken to emissions reduction in the Sustainability Appraisal, the updated report accepts (at p. 14 of Volume 2) the “restricted” nature of the assessment, which is said to fall short of an “in-depth analysis”, with such an analysis requiring “further detail from additional research”. Moreover, in its overall conclusions the report continues to disregard the key question in this context: that is, the extent to which the proposed policies maximise the plan’s potential positive effects on emissions. Rather than simply assessing the relative size of individual policies and sites’ emissions impacts, the appraisal must assess the consistency of all proposed policies and sites with wider climate policy, including whether they fully support the achievement of the national net zero target – itself stated to be a core objective of the plan.(See, e.g., p. 38 of the draft plan: “... to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to

achieve net zero greenhouse gas emissions by 2050.”)

Nonetheless, taking the Sustainability Appraisal on its own terms, the following headline conclusions (set out in the Non-Technical Summary) point to the plan having significant adverse effects on this objective:

☒ “A total of 85 allocated sites are located on previously undeveloped land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence. The proposed development of 49,492 dwellings across Greater Norwich, with a number of developments located within rural Broadland and South Norfolk, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.”

☒ “The majority of new residents would be located in areas with good access to services and facilities, including convenience stores and bus services. Nevertheless, large areas of Broadland and South Norfolk have limited access to rail services.”

☒ “Approximately 1,019ha of development allocated within the GNLP is located on previously undeveloped land. This would be expected to result in the permanent and irreversible loss of ecologically, and potentially agriculturally, important soil resources. ... Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish. The scale of development proposed within the GNLP would be expected to increase pressure on essential ecosystem services.”

In response, the GNLP authorities appear to accept these conclusions and, while pointing to attempts to “limit” these impacts in the plan, fall short of suggesting that a lower emissions approach to allocating development was not possible. (GNLP Authorities’ Response to Sustainability Appraisal Residual Effects from the Reg 19 GNLP, January 2021.) Indeed, it would appear that these adverse effects have been exacerbated by the decision to plan for a level of housing that exceeds the assessed need by some 20% / 10,000 houses, and which therefore unnecessarily provides for development on greenfield land and in unsustainable locations.

The impact of this decision is clear from looking at a few examples of the Sustainability Appraisal’s assessment of allocations made in the plan:

☒ In respect of the Key Service Centre allocations (at C.9.12.2): “It is assumed that this policy would be in conformity with the requirements of other policies, such as Policy 4, to promote sustainable transport. This could potentially help to improve access to workplaces and social infrastructure. However, as these Key Service Areas are located in primarily rural areas across Greater Norwich, improvements to transport infrastructure set out in Policy 4 would be unlikely to provide all site end users with sustainable connections to Norwich city centre, Norfolk and nationally.”

☒ In respect of the Village Clusters allocations:

o “There is a vast network of [Public Rights of Way] across Greater Norwich. This would be likely to provide good pedestrian access within and around these settlements. However, many of the Village Clusters are situated in remote areas within Greater Norwich, with limited access to railway stations, which are primarily located within Norwich and the east of the Plan area, with some stations also located to the west of South Norfolk. Site end users in more rural locations would also be expected to have limited access to regular bus services, despite some expected transport improvements in line with Policy 4. It is likely that a large proportion of site end users would be situated outside the target distance of public transport links. The rural location of development proposals under this policy would be expected to contribute to a relatively high reliance on personal car use...” (C.10.12.1)

o “Under this policy, it is likely that development will occur at a number of greenfield sites, which would be expected to result in a net loss of agriculturally and ecologically valuable soils. As the significant majority of soils in the Plan area are Grade 3 land, it is likely that this policy would result in a net loss of BMV land. This impact would be permanent and non-reversible and would also reduce the carbon sink capacity of soils across the Plan area.” (C.10.14.1)

☒ In respect of site GNLP4054 – for provision of 400 dwellings:

o “Sites GNLP4052 and GNLP4054 comprise previously undeveloped land and are located outside the existing settlement of Hethersett. Therefore, the proposed development at these two sites could potentially contribute towards the urbanisation of the countryside.” (D.17.4.4)

o “The nearest convenience stores, Park Drive Stores and Tesco Express, are located in the centre of Hethersett. Sites GNLP4052 and GNLP4054 are located outside the target distance to these shops.” (D.17.6.1)

o “Hethersett Surgery is located in the centre of Hethersett. Sites GNLP4052 and GNLP4054 are located wholly or partially outside the target distance to this GP surgery.” (D.17.8.5)

o “Hethersett Woodside Infant and Nursery School and Hethersett Voluntary Controlled Junior School are located in the south of Hethersett village. Little Melton Primary School is located to the north of the cluster. Both sites in this cluster are

situated wholly or partially outside the target distance to these schools.” (D.17.10.1)

o “Sites GNLP4052 and GNLP4054 are located wholly or partially outside the target distance to a bus stop providing regular services. ... The closest railway station to Hethersett is Wymondham Railway Station, located approximately 6km to the south west of the cluster. This is outside the target distance ...” (D.17.12.1 and D.17.12.2)

o “The proposed development at Sites GNLP4052 and GNLP4054 would be likely to result in a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.” (D.17.14.2)

☒ In respect of site GNLP0581R – for provision of more than 600 dwellings:

o “Sites GNLP0581R and GNLP4045 comprise previously undeveloped land and are located outside the existing settlements of Costessey and Bowthorpe. Therefore, the proposed development at these two sites could potentially contribute towards the urbanisation of the countryside.” (D.8.4.4)

o “The nearest local services, Co-op, Stafford Stores and Post Office, and Sainsbury’s, are located in and around Costessey. Sites GNLP0581R and GNLP4045 are located outside the target distance to these services.” (D.8.6.1)

o “The closest GP surgeries to this cluster are The Roundwell Medical Centre in Costessey and Taverham Surgery in Taverham. Sites GNLP0581R and GNLP4045 are located outside the target distance to these GP surgeries.” (D.8.8.5)

o “The closest leisure facility to Costessey is Riverside Leisure Centre, located approximately 8km south east of the cluster. Both sites in this cluster are located outside the target distance to this leisure facility ...” (D.8.8.6)

o “The closest primary schools to this cluster include Chapel Break Infant School, St Michael’s Church of England Voluntary Aided Junior School and Queen’s Hill Primary and Nursery School. Sites GNLP0581R and GNLP4045 are situated outside the target distance to these schools.” (D.8.10.1)

o “Sites GNLP0581R and GNLP4045 are located outside the target distance to a bus stop providing regular services. ... The closest railway station to Costessey is Norwich Railway Station, located approximately 8km to the south east of the cluster. This is outside the target distance ... Site GNLP0581R currently has poor access to the surrounding footpath network.” (D.8.12.1-3)

o “The proposed development at Site GNLP0581R would be likely to result in a major negative impact on natural resources due to the loss of more than 20ha of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.” (D.8.14.2)

Accordingly, on its own terms, the Sustainability Appraisal’s findings would appear to support a quite different approach to site allocation – one that avoids as far as possible new development on greenfield land and in unsustainable locations. The above allocations are an illustrative but not exhaustive list of instances of this problem in the plan.

#### Change suggested by respondent:

In preparing the submission version of the plan, we urge you to address fully all of the above issues, as well as those raised at the Regulation 18 stage, to ensure that the plan complies with the applicable statutory and policy requirements.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Full submission - <https://oc2connect.gnlp.org.uk/a/4fg>

24411

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]**Summary:**

It would appear that the adverse effects [identified in the SA report] have been exacerbated by the decision to plan for ..... development on greenfield land and in unsustainable locations.

The impact of this decision is clear from looking at a few examples of the Sustainability Appraisal's assessment of allocations made in the plan:

- In respect of the Village Clusters allocations:

- o "There is a vast network of [Public Rights of Way] across Greater Norwich. This would be likely to provide good pedestrian access within and around these settlements. However, many of the Village Clusters are situated in remote areas within Greater Norwich, with limited access to railway stations, which are primarily located within Norwich and the east of the Plan area, with some stations also located to the west of South Norfolk. Site end users in more rural locations would also be expected to have limited access to regular bus services, despite some expected transport improvements in line with Policy 4. It is likely that a large proportion of site end users would be situated outside the target distance of public transport links. The rural location of development proposals under this policy would be expected to contribute to a relatively high reliance on personal car use..." (C.10.12.1)

- o "Under this policy, it is likely that development will occur at a number of greenfield sites, which would be expected to result in a net loss of agriculturally and ecologically valuable soils. As the significant majority of soils in the Plan area are Grade 3 land, it is likely that this policy would result in a net loss of BMV land. This impact would be permanent and non-reversible and would also reduce the carbon sink capacity of soils across the Plan area." (C.10.14.1)

**Change suggested by respondent:**

Accordingly, on its own terms, the Sustainability Appraisal's findings would appear to support a quite different approach to site allocation – one that avoids as far as possible new development on greenfield land and in unsustainable locations. The above allocations are an illustrative but not exhaustive list of instances of this problem in the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Full submission - <https://oc2connect.gnlp.org.uk/a/4fg>

24409

Object

**Hethersett, Settlement Map****Respondent:** ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]

**Summary:**

It would appear that the adverse effects [identified in the SA report] have been exacerbated by the decision to plan for ..... development on greenfield land and in unsustainable locations.

The impact of this decision is clear from looking at a few examples of the Sustainability Appraisal's assessment of allocations made in the plan:

- In respect of the Key Service Centre allocations (at C.9.12.2): "It is assumed that this policy would be in conformity with the requirements of other policies, such as Policy 4, to promote sustainable transport. This could potentially help to improve access to workplaces and social infrastructure. However, as these Key Service Areas are located in primarily rural areas across Greater Norwich, improvements to transport infrastructure set out in Policy 4 would be unlikely to provide all site end users with sustainable connections to Norwich city centre, Norfolk and nationally."
- In respect of the Village Clusters allocations:
  - o "There is a vast network of [Public Rights of Way] across Greater Norwich. This would be likely to provide good pedestrian access within and around these settlements. However, many of the Village Clusters are situated in remote areas within Greater Norwich, with limited access to railway stations, which are primarily located within Norwich and the east of the Plan area, with some stations also located to the west of South Norfolk. Site end users in more rural locations would also be expected to have limited access to regular bus services, despite some expected transport improvements in line with Policy 4. It is likely that a large proportion of site end users would be situated outside the target distance of public transport links. The rural location of development proposals under this policy would be expected to contribute to a relatively high reliance on personal car use..." (C.10.12.1)
  - o "Under this policy, it is likely that development will occur at a number of greenfield sites, which would be expected to result in a net loss of agriculturally and ecologically valuable soils. As the significant majority of soils in the Plan area are Grade 3 land, it is likely that this policy would result in a net loss of BMV land. This impact would be permanent and non-reversible and would also reduce the carbon sink capacity of soils across the Plan area." (C.10.14.1)
- In respect of site GNLP4054 – for provision of 400 dwellings:
  - o "Sites GNLP4052 and GNLP4054 comprise previously undeveloped land and are located outside the existing settlement of Hethersett. Therefore, the proposed development at these two sites could potentially contribute towards the urbanisation of the countryside." (D.17.4.4)
  - o "The nearest convenience stores, Park Drive Stores and Tesco Express, are located in the centre of Hethersett. Sites GNLP4052 and GNLP4054 are located outside the target distance to these shops." (D.17.6.1)
  - o "Hethersett Surgery is located in the centre of Hethersett. Sites GNLP4052 and GNLP4054 are located wholly or partially outside the target distance to this GP surgery." (D.17.8.5)
  - o "Hethersett Woodside Infant and Nursery School and Hethersett Voluntary Controlled Junior School are located in the south of Hethersett village. Little Melton Primary School is located to the north of the cluster. Both sites in this cluster are situated wholly or partially outside the target distance to these schools." (D.17.10.1)
  - o "Sites GNLP4052 and GNLP4054 are located wholly or partially outside the target distance to a bus stop providing regular services. ... The closest railway station to Hethersett is Wymondham Railway Station, located approximately 6km to the south west of the cluster. This is outside the target distance ..." (D.17.12.1 and D.17.12.2)
  - o "The proposed development at Sites GNLP4052 and GNLP4054 would be likely to result in a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils." (D.17.14.2)

**Change suggested by respondent:**

The Sustainability Appraisal's findings would appear to support a quite different approach to site allocation – one that avoids as far as possible new development on greenfield land and in unsustainable locations. The above allocations are an illustrative but not exhaustive list of instances of this problem in the plan.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Written Representation



**Attachments:** Full submission - <https://oc2connect.gnlp.org.uk/a/4fg>

## 24410

## Object

### Costessey, Settlement Map

**Respondent:** ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]

#### Summary:

It would appear that the adverse effects [identified in the SA report] have been exacerbated by the decision to plan for ..... development on greenfield land and in unsustainable locations.

The impact of this decision is clear from looking at a few examples of the Sustainability Appraisal's assessment of allocations made in the plan:

- In respect of site GNLP0581R – for provision of more than 600 dwellings:
  - o “Sites GNLP0581R and GNLP4045 comprise previously undeveloped land and are located outside the existing settlements of Costessey and Bowthorpe. Therefore, the proposed development at these two sites could potentially contribute towards the urbanisation of the countryside.” (D.8.4.4)
  - o “The nearest local services, Co-op, Stafford Stores and Post Office, and Sainsbury’s, are located in and around Costessey. Sites GNLP0581R and GNLP4045 are located outside the target distance to these services.” (D.8.6.1)
  - o “The closest GP surgeries to this cluster are The Roundwell Medical Centre in Costessey and Taverham Surgery in Taverham. Sites GNLP0581R and GNLP4045 are located outside the target distance to these GP surgeries.” (D.8.8.5)
  - o “The closest leisure facility to Costessey is Riverside Leisure Centre, located approximately 8km south east of the cluster. Both sites in this cluster are located outside the target distance to this leisure facility ...” (D.8.8.6)
  - o “The closest primary schools to this cluster include Chapel Break Infant School, St Michael’s Church of England Voluntary Aided Junior School and Queen’s Hill Primary and Nursery School. Sites GNLP0581R and GNLP4045 are situated outside the target distance to these schools.” (D.8.10.1)
  - o “Sites GNLP0581R and GNLP4045 are located outside the target distance to a bus stop providing regular services. ... The closest railway station to Costessey is Norwich Railway Station, located approximately 8km to the south east of the cluster. This is outside the target distance ... Site GNLP0581R currently has poor access to the surrounding footpath network.” (D.8.12.1-3)
  - o “The proposed development at Site GNLP0581R would be likely to result in a major negative impact on natural resources due to the loss of more than 20ha of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.” (D.8.14.2)

#### Change suggested by respondent:

Accordingly, on its own terms, the Sustainability Appraisal's findings would appear to support a quite different approach to site allocation – one that avoids as far as possible new development on greenfield land and in unsustainable locations. The above allocations are an illustrative but not exhaustive list of instances of this problem in the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Full submission - <https://oc2connect.gnlp.org.uk/a/4fg>

24555

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]**Summary:**

It would appear that the adverse effects [identified in the SA report] have been exacerbated by the decision to plan for ..... development on greenfield land and in unsustainable locations.

The impact of this decision is clear from looking at a few examples of the Sustainability Appraisal's assessment of allocations made in the plan:

- In respect of site GNLP0581R – for provision of more than 600 dwellings:
  - o “Sites GNLP0581R and GNLP4045 comprise previously undeveloped land and are located outside the existing settlements of Costessey and Bowthorpe. Therefore, the proposed development at these two sites could potentially contribute towards the urbanisation of the countryside.” (D.8.4.4)
  - o “The nearest local services, Co-op, Stafford Stores and Post Office, and Sainsbury’s, are located in and around Costessey. Sites GNLP0581R and GNLP4045 are located outside the target distance to these services.” (D.8.6.1)
  - o “The closest GP surgeries to this cluster are The Roundwell Medical Centre in Costessey and Taverham Surgery in Taverham. Sites GNLP0581R and GNLP4045 are located outside the target distance to these GP surgeries.” (D.8.8.5)
  - o “The closest leisure facility to Costessey is Riverside Leisure Centre, located approximately 8km south east of the cluster. Both sites in this cluster are located outside the target distance to this leisure facility ...” (D.8.8.6)
  - o “The closest primary schools to this cluster include Chapel Break Infant School, St Michael’s Church of England Voluntary Aided Junior School and Queen’s Hill Primary and Nursery School. Sites GNLP0581R and GNLP4045 are situated outside the target distance to these schools.” (D.8.10.1)
  - o “Sites GNLP0581R and GNLP4045 are located outside the target distance to a bus stop providing regular services. ... The closest railway station to Costessey is Norwich Railway Station, located approximately 8km to the south east of the cluster. This is outside the target distance ... Site GNLP0581R currently has poor access to the surrounding footpath network.” (D.8.12.1-3)
  - o “The proposed development at Site GNLP0581R would be likely to result in a major negative impact on natural resources due to the loss of more than 20ha of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.” (D.8.14.2)

**Change suggested by respondent:**

Accordingly, on its own terms, the Sustainability Appraisal's findings would appear to support a quite different approach to site allocation – one that avoids as far as possible new development on greenfield land and in unsustainable locations. The above allocations are an illustrative but not exhaustive list of instances of this problem in the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Full submission - <https://oc2connect.gnlp.org.uk/a/4fg>

24245

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Climate Friendly Policy and Planning (CFPP) (Dr Andrew Boswell, Consultant) [12486]**Summary:**

Please find the consultation response from Climate Emergency Planning and Policy to the Reg 19 Pre-Publication Draft GNLP attached.

**Change suggested by respondent:**

Please find the consultation response from Climate Emergency Planning and Policy to the Reg 19 Pre-Publication Draft GNLP attached.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** CEPP-BOSWELL\_GNLP\_R19\_2021Mar\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4c5>

24246

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Climate Friendly Policy and Planning (CFPP) (Dr Andrew Boswell, Consultant) [12486]**Summary:**

Please find the consultation response from Climate Emergency Planning and Policy to the Reg 19 Pre-Publication Draft GNLP attached.

**Change suggested by respondent:**

Please find the consultation response from Climate Emergency Planning and Policy to the Reg 19 Pre-Publication Draft GNLP attached.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** CEPP-BOSWELL\_GNLP\_R19\_2021Mar\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4c5>

24247

Object

**Site Assessment Booklets and Studies, Sustainability Appraisal Report****Respondent:** Climate Friendly Policy and Planning (CFPP) (Dr Andrew Boswell, Consultant) [12486]**Summary:**

Please find the consultation response from Climate Emergency Planning and Policy to the Reg 19 Pre-Publication Draft GNLP attached.

**Change suggested by respondent:**

Please find the consultation response from Climate Emergency Planning and Policy to the Reg 19 Pre-Publication Draft GNLP attached.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** CEPP-BOSWELL\_GNLP\_R19\_2021Mar\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4c5>

23439

Object

**Reedham, 6.93****Respondent:** Mr John Cockburn [18983]**Summary:**

I do not consider current road infrastructure to be suitable for additional traffic. Most of the local roads will not accommodate two large vehicles passing, and are single track in many places. Any increase in traffic will increase the risk of accidents, especially in Moulton St Mary where there are several potentially dangerous corners. Access to doctors is very limited. There would be a requirement to improve sewage system as this has to be tinkered away. Bus service is infrequent. Trains limited with poor access to Great Yarmouth. Cars are almost a requisite. Urbanisation of the village.

**Change suggested by respondent:**

Prior to any further development the Highways to Reedham would require substantial improvement by widening, in addition to addressing the problems above.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23913

Object

**Aylsham, Settlement Map****Respondent:** Colby & Banningham Parish Council (Mrs Mo Anderson-Dungar, Clerk) [12580]**Summary:**

Aylsham is our nearest market town and any proposals to increase housing, with the resultant impact on services, would undoubtedly affect our residents.

1. The proposals suggest 550 new houses for Aylsham, spread across two sites.
2. The first, on Burgh Road, of 300 homes, included provision for a primary school.
3. The second, on Norwich Road, was added without warning or consultation with the town; this is unreasonable and represents an increase of 83% - a failure to consult on a significant change.
4. Infrastructure issues have not been addressed, in particular water/sewerage, plus parking in the town to cope with the increased demand on primary care, dentists, shops and supermarkets.
5. Schools are at capacity now – the new primary school proposed as part of the first development would probably be built after completion, There would also be increased pressure on secondary and early years provision – there is no mention of this in the plan.
6. Planning and community involvement has not been met as detailed in the National Planning Policy Framework, neither has the duty of co-operation to engage with various stakeholders during the preparation of the plan.
7. The proposed 325 houses at Badersfield would also impact on Aylsham
8. The Covid crisis is likely to reduce footfall in the City, but increase it in surrounding towns; it would make more sense to concentrate new housing nearer to existing retail capacity and employment opportunities – i.e. in the larger towns and the City, particularly using existing brownfield sites.

For the reasons outlined above, the Council does not consider the plan to be sound as defined under Regulation 19.

A

**Change suggested by respondent:**

-

**Legally No  
compliant:**

**Sound: No**

**Comply with No  
duty:**

**Appear exam:** Written Representation

**Attachments:** None

23711

Object

**Aylsham, Settlement Map****Respondent:** Ray Coles [19940]**Summary:**

I am writing with my comments on the GNLP plan but specifically on the effect on Aylsham. I am amazed that the residents of Aylsham have not been consulted on the Plan as it now stands, and it seems that there are now two sites for future development, whereas previously there was just the one. I am informed that this has never been put forward for consultation, and is therefore not legally compliant.

Furthermore, Regulation 19 does not consider the obvious impact of the two development sites on the town. Aylsham has already been the site of two large housing developments over the past five years, and the existing infrastructure has had to absorb these large developments, so any further strain will be impossible to absorb. In particular, health facilities and schooling would not be able to cope, let alone the road structure and the poor public transport, with no trains and only an intermittent bus service (many of the buses just skirt around the town, therefore being useless to Aylsham residents).

Therefore, I believe that the legal position of the Plan is not legal and is thus unsound.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23460

Object

**Great and Little Plumstead, Settlement Map****Respondent:** Mr Gary Collier [18801]**Petition:** 2 petitioners**Summary:**

I object to the Greater Norwich Local Plan for the following reasons.

The plan is unsound and does not include any allocations at Greater & Little Plumstead.

There has been no consideration for both Greater and Little Plumstead to expand and grow so the local residents/ population can have the right to build within the community offering affordable housing, family housing, retirement housing and even a care home.

Our property which was put forward, Home Farm, Little Plumstead, NR13 5EX - GNLP3014R is far the best to be considered for the GNLP as there is room for further substantial growth within the local community, even proposing to build shops, small business premises and a Post Office. In total approx 30 acres that can be developed on this site. It would create jobs

for local tradesmen, local material sourcing and an opportunity for a local building firm to complete the constructions.

The council has a duty to the Greater and Little Plumstead villages to move forward to develop and prosper these ancient villages and not to be left behind in the 21st century, so the next generation of families can also live within their local community.

This is my proposal for the Regulation 19 GNLP and this is far the best site to be considered.

**Change suggested by respondent:**

I object to the Greater Norwich Local Plan for the following reasons.

The plan is unsound and does not include any allocations at Greater & Little Plumstead.

There has been no consideration for both Greater and Little Plumstead to expand and grow so the local residents/ population can have the right to build within the community offering affordable housing, family housing, retirement housing and even a care home.

Our property which was put forward, Home Farm, Little Plumstead, NR13 5EX - GNLP3014R is far the best to be considered for the GNLP as there is room for further substantial growth within the local community, even proposing to build shops, small business premises and a Post Office. In total approx 30 acres that can be developed on this site. It would create jobs

for local tradesmen, local material sourcing and an opportunity for a local building firm to complete the constructions.

The council has a duty to the Greater and Little Plumstead villages to move forward to develop and prosper these ancient villages and not to be left behind in the 21st century, so the next generation of families can also live within their local community.

This is my proposal for the Regulation 19 GNLP and this is far the best site to be considered.

**Legally No  
compliant:**

**Sound: No**

**Comply with No  
duty:**

**Appear exam:** Written Representation

**Attachments:** None

23536

Object

**Foreword****Respondent:** Colney Parish Council (Mrs H Martin, Clerk) [13644]**Summary:**

On behalf of Colney parish, Colney committee have considered the plans, and would like it noted that they fully endorse the consultation response submitted by CPRE Norfolk regarding the plan.

**Change suggested by respondent:**

On behalf of Colney parish, Colney committee have considered the plans, and would like it noted that they fully endorse the consultation response submitted by CPRE Norfolk regarding the plan.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** GNLP Reg 19 summary CPRE Norfolk[16929][17864].pdf - <https://oc2connect.gnlp.org.uk/a/44p>

23843

Object

**Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets****Respondent:** Colney Parish Council (Mrs H Martin, Clerk) [13644]**Summary:**

Regarding Colney Hall (site reference GNLP0253), the actual area identified for the purpose of older people's accommodation is misleading as it contains historic parkland outside the development boundary, and Colney requests that this be amended.

**Change suggested by respondent:**

We therefore request that the actual zoning in the final GNLP be altered to where the proposed accommodation is being advanced. But we reserve the right to object to any proposals for this particular area on the grounds that it is outside the development boundary which we wish to protect along the lines of the Parish Plan.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



24164

Object

**Policy 2019, 2019 Policy****Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]**Summary:**

Col1 and GNLP2019 form a continuous site on Rectory Rd. Coltishall Parish Council has objected to the development of this site on a number of grounds, the most important being:

- a) It is a greenfield site with high levels of biodiversity.
- b) The footpath in front of the site is the route for pedestrians going to the school, playground and other amenities on Rectory Rd from the Ling Way estate on the other side of the B1150. The proposed development introduces three new roadways to be crossed. In addition it will be necessary to cross traffic from the development at two further points: on Rectory Rd at the crossing to the east side of the B1150 and at the crossing of the B1150 itself.
- c) There is an existing safety concern with the junction of Rectory Rd and the B1150. All traffic from the development will be routed to this junction. This is a potentially dangerous junction for all users, but particularly for pedestrians crossing the B1150. SAM speed camera data from Feb 2019 shows that in peak periods a vehicle passes every 4.3 seconds (northbound +southbound). 60% of vehicles break the speed limit

Col2 is a site on Station Rd. Station road carries very high levels of traffic. Coltishall Parish Council does not believe this is a healthy location for a residential development. There is no footpath on the east side of Station Road down to the high street and crossing the road to the west side would be perilous.

An objection to both developments is that they will be highly car dependent and add to the existing problem of heavy traffic. Significant sources of employment and education beyond primary level lie outside the village. The Coltishall Post Office has closed down- customers must now drive to Badersfield. Poor provision for walking and cycling generates vehicle traffic within the village.

It should be noted that the housing supply outlined for Coltishall by Broadland District Council previous local plan (37) and current local plan requirement (15-20) is already in surplus. Between 2004 and 2019; 57 houses have been given planning permission and built in Coltishall. This means that the houses expected for Coltishall have already been built based on Broadland District Council's plans.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** Coltishall Parish Council response - <https://oc2connect.gnlp.org.uk/a/4gz>

24165

Object

**Policy COL1, COL1 Policy****Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]**Summary:**

Col1 and GNLP2019 form a continuous site on Rectory Rd. Coltishall Parish Council has objected to the development of this site on a number of grounds, the most important being:

- a) It is a greenfield site with high levels of biodiversity.
- b) The footpath in front of the site is the route for pedestrians going to the school, playground and other amenities on Rectory Rd from the Ling Way estate on the other side of the B1150. The proposed development introduces three new roadways to be crossed. In addition it will be necessary to cross traffic from the development at two further points: on Rectory Rd at the crossing to the east side of the B1150 and at the crossing of the B1150 itself.
- c) There is an existing safety concern with the junction of Rectory Rd and the B1150. All traffic from the development will be routed to this junction. This is a potentially dangerous junction for all users, but particularly for pedestrians crossing the B1150. SAM speed camera data from Feb 2019 shows that in peak periods a vehicle passes every 4.3 seconds (northbound +southbound). 60% of vehicles break the speed limit

Col2 is a site on Station Rd. Station road carries very high levels of traffic. Coltishall Parish Council does not believe this is a healthy location for a residential development. There is no footpath on the east side of Station Road down to the high street and crossing the road to the west side would be perilous.

An objection to both developments is that they will be highly car dependent and add to the existing problem of heavy traffic. Significant sources of employment and education beyond primary level lie outside the village. The Coltishall Post Office has closed down- customers must now drive to Badersfield. Poor provision for walking and cycling generates vehicle traffic within the village.

It should be noted that the housing supply outlined for Coltishall by Broadland District Council previous local plan (37) and current local plan requirement (15-20) is already in surplus. Between 2004 and 2019; 57 houses have been given planning permission and built in Coltishall. This means that the houses expected for Coltishall have already been built based on Broadland District Council's plans.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** Coltishall Parish Council response - <https://oc2connect.gnlp.org.uk/a/4gz>

24166

Object

**Population, 40****Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]**Summary:**

Para 40 of the GNLP says that it follows the standard methodology required by the NPPF in assessing need.

The target for housing in the GNLP is 49,492 houses up to the year 2038 which includes an exceptionally large buffer of 22% above the perceived need.

A 5% buffer is required by the NPPF and there is good reason for the GNLP to use a 5% buffer given that 78% of housing is on greenfield sites and is unsustainable, see 3.0 above.

Setting aside the question of the reasonableness of using a purely trend based methodology for development needs, which is irrelevant here, it is nonetheless possible to take a cautious view of the

predicted household growth derived from the 2014 methodology (Household Projections:2014- 2039). Under that methodology population growth accounts for 95% of household growth of which 43% is due to immigration. The England and Wales Total Fertility Rate for 2020 was 1.6 (2019 1.65, 2014 1.85, 2012 1.93)- ie it is now well below the rate of replacement. The pandemic and Brexit may lead to falls in the non UK-born population, and this is suggested by data from the ONS labour force survey to sept 2020 <https://www.escoe.ac.uk/estimating-the-uk-population-during-the-pandemic/>

The minimum figure of 42,568 (40,541+ 5% buffer) should therefore be the housing target, both to reduce the harm of the proposed development, and to reflect recent demographic changes.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** Coltishall Parish Council response - <https://oc2connect.gnlp.org.uk/a/4gz>

24539

Object

**Policy COL2, COL2 Policy****Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]

**Summary:****5.1 Site allocations within Coltishall**

There are 3 site allocations in Coltishall:

Col1 and GNLP2019 form a continuous site on Rectory Rd. Coltishall Parish Council has objected to the development of this site on a number of grounds, the most important being:

- a) It is a greenfield site with high levels of biodiversity.
- b) The footpath in front of the site is the route for pedestrians going to the school, playground and other amenities on Rectory Rd from the Ling Way estate on the other side of the B1150. The proposed development introduces three new roadways to be crossed. In addition it will be necessary to cross traffic from the development at two further points: on Rectory Rd at the crossing to the east side of the B1150 and at the crossing of the B1150 itself.
- c) There is an existing safety concern with the junction of Rectory Rd and the B1150. All traffic from the development will be routed to this junction. This is a potentially dangerous junction for all users, but particularly for pedestrians crossing the B1150. SAM speed camera data from Feb 2019 shows that in peak periods a vehicle passes every 4.3 seconds (northbound +southbound). 60% of vehicles break the speed limit

Col2 is a site on Station Rd. Station road carries very high levels of traffic. Coltishall Parish Council does not believe this is a healthy location for a residential development. There is no footpath on the east side of Station Road down to the high street and crossing the road to the west side would be perilous.

An objection to both developments is that they will be highly car dependent and add to the existing problem of heavy traffic. Significant sources of employment and education beyond primary level lie outside the village. The Coltishall Post Office has closed down- customers must now drive to Badersfield. Poor provision for walking and cycling generates vehicle traffic within the village. It should be noted that the housing supply outlined for Coltishall by Broadland District Council previous local plan (37) and current local plan requirement (15-20) is already in surplus. Between 2004 and 2019; 57 houses have been given planning permission and built in Coltishall. This means that the houses expected for Coltishall have already been built based on Broadland District Council's plans.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Coltishall Parish Council response - <https://oc2connect.gnlp.org.uk/a/4gz>

**24540**

**Object**

**Transport, 231**

**Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]

**Summary:****3.2**

Failure to follow NPPF guidance on sustainable transport (section 9)

The policy of dispersion rather than concentration is contrary to guidance in para 103 of the NPPF.

Despite a stated commitment in the GNLP to sustainable transport and lowered emissions (paragraphs 93,97,152,157 and others) this is not backed by any specific proposals or commitments for public transport, cycling or walking (See 4.0 below), contrary to para 102 of the NPPF.

On the other hand environmentally damaging transport infrastructure development is at the heart of the plan ensuring that net environmental gain is impossible, contrary to guidance (NPPF paras 8 and 102).

The GNLP promotes large scale road building, including the Norwich western link road, ignoring the well-established fact that new road construction induces further road demand and is therefore unsustainable in terms of emissions as well as being directly destructive of the environment. It causes increased traffic in other parts of the road network.

While there is a requirement in the NPPF to maintain general aviation airfields, the GNLP commits to expanding this highly polluting and unsustainable industry. Policy 4 of the GNLP (strategic infrastructure) supports 'the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond'. The area allocated for aviation and business linked to the airport is 85.5 hectares (allocated but undeveloped plus proposed), by far the largest allocation by primary employment use.

**4.0**

Sustainable transport provision in the GNLP

If sustainability is a genuine consideration in determining the nature of development, and if the plan is to meet the requirements of the NPPF, then proposals for sustainable transport should be part of decision making from the earliest stages (NPPF para 102) and should be included in the plan and should form part of the assessment for development sites. However there are no such proposals in the GNLP.

Examples of commitments the might partly mitigate the harms inherent in the GNLP:

A network of protected cycle lanes with routes specified; a detailed commitment to safe cycle and walking routes to schools.

Recommendations on road junctions, pavements and other infrastructure, to make walking safer and more attractive.

Policy on speed limits and enforcement, and traffic calming

Improvements to existing bus services. Reinstatement of bus services. New bus services.

Proposals to link bus and rail services. More frequent rail services on the Wherry and Bittern lines

Moreover, existing infrastructure is described inaccurately, if at all:

Paragraph 88 refers to a 'relatively good existing cycle network'. There is no network in the sense of a broad continuous system even in Norwich. Outside Norwich, nothing exists that could be described as a network. The Marriot way mentioned is not a link to anywhere except for tourism and leisure purposes.

Paras 89 and 238 reference the transforming cities programme which may provide additional funding for buses in the TfN area, but no attempt is made to describe the existing service or how this might be improved and how changes might serve the new development.

Outside the TfN area the reference is to the Market Town Network Improvement Strategies. These reports are focussed narrowly on each town and are not a source of significant policies for linking centres using sustainable transport. The Wroxham and Hoveton report (closest to Coltishall) makes recommendations for tiny improvements to cycling and walking within those settlements and none for public transport.

No assessment is made in the GNLP of current road traffic volumes, how these have been affected by recent development, particularly the NDR, and how they might be affected by further development.

The approval of site allocations under the GNLP gives permission in principle for development.

However, transport impacts and mitigating strategies have not been assessed prior to site allocation.

This is not consistent with the NPPF paras 102 and 103.

**Change suggested by respondent:**

-

Legally Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Coltishall Parish Council response - <https://oc2connect.gnlp.org.uk/a/4gz>

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**24541****Object**

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**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy**

**Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]

**Summary:**

Much of the harm identified by the Sustainability Appraisal and Strategic Environmental Assessment is due to the use of greenfield sites. Large scale greenfield development in Greater Norwich is inherently unsustainable and runs contrary to the guidance in NPPF para 107. 78% of housing (38,600 houses) is on greenfield sites. In addition, over 300ha is allocated to commercial use. 1019 ha in total of previously undeveloped land will be used. The plan allocates 4,220 houses to 'village clusters' and 6,800 to surrounding towns, plus windfall housing, and this is likely to be particularly harmful. Such development is contrary to good planning policy and is unnecessary. Large amounts of office and retail space in the city centre are likely to be redundant following the pandemic and to become available for redevelopment.

**Change suggested by respondent:**

-

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Coltishall Parish Council response - <https://oc2connect.gnlp.org.uk/a/4gz>

23855

Object

**Introduction, 158****Respondent:** Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]**Summary:****Objection**

- a) it is not positively prepared as it is not consistent with achieving sustainable development
- b) it is not justified as it is not an appropriate strategy, taking into account all reasonable alternatives
- c) it is not effective, the goal of sustainable development will not be achieved by the plan
- d) it is not consistent with national policy- it does not deliver sustainable development in accordance with the policies in the Framework or meet the legal requirement to mitigate and adapt to climate change in 19 (1A) of the Planning and Compulsory Purchase Act 2004

**Change suggested by respondent:**

- a) GNLP needs to meet the NPPF definition of Sustainable Development; the GNLP does not comply with 19 (1A) of the Planning and Compulsory Purchase Act 2004
- b) GNLP needs to follow NPPF guidance on conserving and enhancing the natural environment (section 15)
- c) GNLP needs to follow NPPF guidance on sustainable transport
- d) Proposals for sustainable transport should be part of decision making from the earliest stages (NPPF para 102) and should be included in the plan and should form part of the assessment for development sites. Coltishall will suffer further traffic growth due the Norwich Western Link Road and dispersed housing development. As noted above there are no proposals for sustainable transport that might partly mitigate this harm
- e) The minimum figure of 42,568 (40,541+ 5% buffer) should therefore be the housing target, both to reduce the harm of the proposed development, and to reflect recent demographic changes.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** CPC Response Reg 19 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/46n>

23231

Object

**Policy 7.4 Village Clusters, 382****Respondent:** Niall Cook [14744]**Summary:**

I fail to see how a draft plan for the Greater Norwich area can be published and be made available for representations with such a huge part of it missing. It is unclear whether the proposed South Norfolk Village Clusters Housing Site Allocations Local Plan will have its own policies (which may contradict those of the GNLP).

**Change suggested by respondent:**

It should be made clear in this document that the South Norfolk Village Clusters Housing Site Allocations Local Plan (SNVCHSAP) is simply an appendix of site allocations AND NOT a "local plan" for that area. Equally it should be made clear which policies take priority in the event of any conflict. Furthermore, it should be explained how planning decisions will be made when the GNLP comes into force yet the SNVCHSAP has not yet been published.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23228

Support

**Policy 7.5 Small Scale Windfall Housing Development, 390****Respondent:** Niall Cook [14744]**Summary:**

I am fully in support of this aspect of the policy, especially it has been proven through planning appeals that South Norfolk Council is incorrectly counting ALL single dwelling permissions against its requirements under the Self-Build and Custom Housebuilding Act (see appeal ref: APP/L2630/W/20/3247374), and that despite its claims it actually has a shortfall in meeting self-build need.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23229

Support

**Policy 7.5 Small Scale Windfall Housing Development, 391**

Respondent: Niall Cook [14744]

**Summary:**

I am fully in support of this aspect of the policy, however it is very badly worded and leaves room for ambiguity, particularly in terms of the definition of the word "settlement". Would "adjacent to settlements with development boundaries" in part (a) include sites in villages ("settlements"?) WITHOUT development boundaries but which are adjacent to villages which DO have development boundaries? Or does it mean sites that are adjacent to, but outside, an existing development boundary? (b) is also badly worded. "in villages/settlements" needs adding between "dwellings" and "which".

**Change suggested by respondent:**

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Appear exam: Not specified

Attachments: None

23230

Support

**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development**

Respondent: Niall Cook [14744]

**Summary:**

I am fully supportive of this proposal, but the wording is ambiguous and open to interpretation. Section 391 states that such development is permitted "adjacent to settlements with development boundaries" yet this states "adjacent to a development boundary". These two statements have different meanings, so which is it?

**Change suggested by respondent:**

-

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Appear exam: Not specified

Attachments: None

23232

Object

**Policy 7.4 Village Clusters, 387****Respondent:** Niall Cook [14744]**Summary:**

Policy 7.4 is actually silent on the matter of self/custom-build, so this statement 387 is actually contrary to the wording of Policy 7.5, which allows for small-scale windfall development in village clusters without a settlement boundary, with positive consideration given to self and custom build.

**Change suggested by respondent:**

It should be made clear here that Policy 7.5 supports small-scale development of self/custom-build housing adjacent to settlements with development boundaries or on sites within or adjacent to a recognisable group of dwellings which do not have a development boundary, as per the wording in Policy 7.5.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23424

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]**Summary:**

Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up

with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNPD Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

#### **Change suggested by respondent:**

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNPD it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNPD Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the

GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

## 23425

## Object

### Introduction, 158

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

#### Summary:

Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning

authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

**Change suggested by respondent:**

## Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate

change. This should result in inclusion of the “additional” brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

## 23426

## Object

### Emissions and Climate Change, 93

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

#### Summary:

##### Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: ‘development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’ Whilst the GNLP’s Climate Change Statement states that it will ‘have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks’, it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that ‘the document meets the NPPF’s primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038’, whereas it should be stating that it meets the NPPF’s primary purpose for a local plan to provide for “sustainable development”.

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that ‘mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP’. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken ‘reviewing the key messages and current thinking on climate change’. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that ‘some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating’, showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option

4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

#### **Change suggested by respondent:**

##### Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNDP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNDP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNDP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNDP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

## 23427

## Object

### Emissions and Climate Change, 97

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

#### Summary:

Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the

NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to every-day services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

#### **Change suggested by respondent:**

##### **Climate Change**

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others

where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that ‘the document meets the NPPF’s primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038’, whereas it should be stating that it meets the NPPF’s primary purpose for a local plan to provide for “sustainable development”.

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that ‘mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP’. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken ‘reviewing the key messages and current thinking on climate change’. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that ‘some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating’, showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location 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; reducing the need to travel and promoting the use of sustainable transport modes; 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 and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.

Para. 97 of the Reg. 19 GNLP states that ‘policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate’. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: ‘the policies covering the location of development ensure that new housing will be close to every-day services and jobs’ and ‘growth in villages is located where there is good access to services to support their retention.’ This is not always the case, with many rural housing site allocations and anticipated “windfalls” not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk’s village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the “additional” brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

23428

Object

**Housing, 53****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]**Summary:**

## Housing Delivery

The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high as it will not enable the delivery of sustainable development which should prioritise the use of brownfield over greenfield sites. It is worth noting that the Government in its response to the recent Changes to the Planning System consultation appears to indicate more room for divergence from the housing needs figure derived from the standard method. Aside from stating that the current standard method will be retained with additional tweaks, this response also specifies that the standard method should not be interpreted as a "target in plan making", but rather as a "starting point" which should be considered "alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development" before making "the decision on how many homes should be planned for". The response goes on to insist on the fact that the standard method "does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (which specifically allows for a divergence from the standard method in cases where the scale of development would cause harm) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology, and instead it could be used to set lower targets due to local circumstances and constraints.

Delivery of such a large number of houses would make it difficult or even impossible to meet climate change targets, including the legally binding commitment to reach net zero by 2050, particularly as these are likely to be made more stringent during the life of the plan. If climate change is going to be the priority it should be, then the number of new houses in the plan should be kept to the legally required minimum rather than inflated to the proposed levels which are far above the legal requirement or "need". Moreover, the location of any new housing should be reviewed in light of climate change targets and legislation, so that sites are allocated in the most sustainable locations, bearing in mind the importance of environmental factors in ensuring development is sustainable in the NPPF (paragraph 8), and a plan sound.

The GNLP proposes to have 'enough committed sites to accommodate 22% more homes than "need", along with a "contingency" location for growth, should they be required to offset any non-delivery. Additional opportunities will be

provided, particularly small scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development' (Reg. 19 GNLP Delivery Statement.) Having such a high buffer of 22% makes the GNLP unsound due to this almost certain to result in failure to meet necessary climate change targets, legislation and aspirations. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.

It is important that prioritisation is given to the delivery of brownfield sites, in line with the Government's stated intentions and the need to help to address climate change. If more new allocations and windfalls outside rural settlement boundaries are permitted then it is highly likely that development will take place there rather than on urban brownfield sites, where development may not be so streamlined or cost-effective for the developer.

There is clear and compelling evidence from historic completions that windfalls are highly likely to come forward for

development, with the Reg. 19 GNLP forecasting that an estimated 4,450 resulting from windfall development will come forward during the plan period, and yet only 1,296 dwellings have been included as a windfall allowance. 'As windfall delivery is likely to remain robustly high', it would be sound to include a much higher number within this allowance, thus meaning that fewer new housing allocations would be required on less sustainable greenfield rural sites. This is also further evidence that a 22% buffer is unnecessarily high.

We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan (SNVCHAHA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.

We question the inclusion of a "contingency" site or sites, such as that at Costessey (Reg. 19 para. 181) for 'around 800 homes', but which we believe should also include those identified 'to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan' (page 15, GNLP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and "unneeded" houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is "needed", whereby the additional or "extra" numbers are only included if actually "needed" following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.

It is important that the GNLP does not over-promise by allocating large numbers of sites for housing above and beyond what is "needed". It is clear from the current JCS that the targets set were too high, as with five years left of the JCS 31,452 commitments remain. To reach the GNLP target of 49,492 houses an average annual delivery rate of 2,458 would be required over the period 2020 – 2038. The average annual delivery rate for 2011 - 2020 was 1,841, which is significantly below what would be required as an annual average delivery-rate for the GNLP. It would be more sound to

set a more realistic target figure, which would be more likely to be met: this would be easier and more likely to be achieved if the target is as low as can be permitted.

Building regulations are not currently stringent enough to ensure that new buildings are carbon neutral. This issue is meant to be addressed for 2025, but there is no guarantee this will happen, and it is therefore highly likely that a significant number of the planned new dwellings would be constructed to standards that contribute to climate change. To address this, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level. Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes planned for the district.

#### **Change suggested by respondent:**

Housing Delivery

The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high as it will not enable the delivery of sustainable development which should prioritise the use of brownfield over greenfield sites. It is worth noting that the Government in its response to the recent Changes to the Planning System consultation appears to indicate more room for divergence from the housing needs figure derived from the standard method. Aside from stating that the current standard method will be retained with additional tweaks, this response also specifies that the standard method should not be interpreted as a "target in plan making", but rather as a "starting point" which should be considered "alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development" before making "the decision on how many homes should be planned for". The response goes on to insist on the fact that the standard method "does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (which specifically allows for a divergence from the standard method in cases where the scale of development would cause harm) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology, and instead it could be used to set lower targets due to local circumstances and constraints.

Delivery of such a large number of houses would make it difficult or even impossible to meet climate change targets, including the legally binding commitment to reach net zero by 2050, particularly as these are likely to be made more stringent during the life of the plan. If climate change is going to be the priority it should be, then the number of new houses in the plan should be kept to the legally required minimum rather than inflated to the proposed levels which are far above the legal requirement or "need". Moreover, the location of any new housing should be reviewed in light of climate change targets and legislation, so that sites are allocated in the most sustainable locations, bearing in mind the importance of environmental factors in ensuring development is sustainable in the NPPF (paragraph 8), and a plan sound.

The GNLP proposes to have 'enough committed sites to accommodate 22% more homes than "need", along with a "contingency" location for growth, should they be required to offset any non-delivery. Additional opportunities will be

provided, particularly small scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development' (Reg. 19 GNLP Delivery Statement.) Having such a high buffer of 22% makes the GNLP unsound due to this almost certain to result in failure to meet necessary climate change targets, legislation and aspirations. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.

It is important that prioritisation is given to the delivery of brownfield sites, in line with the Government's stated intentions and the need to help to address climate change. If more new allocations and windfalls outside rural settlement boundaries are permitted then it is highly likely that development will take place there rather than on urban brownfield sites, where development may not be so streamlined or cost-effective for the developer.

There is clear and compelling evidence from historic completions that windfalls are highly likely to come forward for development, with the Reg. 19 GNLP forecasting that an estimated 4,450 resulting from windfall development will come forward during the plan period, and yet only 1,296 dwellings have been included as a windfall allowance. 'As windfall delivery is likely to remain robustly high', it would be sound to include a much higher number within this allowance, thus meaning that fewer new housing allocations would be required on less sustainable greenfield rural sites. This is also further evidence that a 22% buffer is unnecessarily high.

We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan (SNVCHAHA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.

We question the inclusion of a “contingency” site or sites, such as that at Costessey (Reg. 19 para. 181) for ‘around 800 homes’, but which we believe should also include those identified ‘to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan’ (page 15, GNDP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and “unneeded” houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is “needed”, whereby the additional or “extra” numbers are only included if actually “needed” following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.

It is important that the GNLP does not over-promise by allocating large numbers of sites for housing above and beyond what is “needed”. It is clear from the current JCS that the targets set were too high, as with five years left of the JCS 31,452 commitments remain. To reach the GNLP target of 49,492 houses an average annual delivery rate of 2,458 would be required over the period 2020 – 2038. The average annual delivery rate for 2011 - 2020 was 1,841, which is significantly below what would be required as an annual average delivery-rate for the GNLP. It would be more sound to

set a more realistic target figure, which would be more likely to be met: this would be easier and more likely to be achieved if the target is as low as can be permitted.

Building regulations are not currently stringent enough to ensure that new buildings are carbon neutral. This issue is meant to be addressed for 2025, but there is no guarantee this will happen, and it is therefore highly likely that a significant number of the planned new dwellings would be constructed to standards that contribute to climate change. To address this, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level. Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council’s Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes planned for the district.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23429

Object

**Housing Growth Needs, 180****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]**Summary:**

We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan (SNVCHAHA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.

For Full Representation, see attached

**Change suggested by respondent:**

We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan (SNVCHAHA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.

For Full Representation, see attached

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23430

Object

**Housing Growth Needs, 181****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]**Summary:**

We question the inclusion of a "contingency" site or sites, such as that at Costessey (Reg. 19 para. 181) for 'around 800 homes', but which we believe should also include those identified 'to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan' (page 15, GNLP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and "unneeded" houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is "needed", whereby the additional or "extra" numbers are only included if actually "needed" following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.



**Change suggested by respondent:**

We question the inclusion of a "contingency" site or sites, such as that at Costessey (Reg. 19 para. 181) for 'around 800 homes', but which we believe should also include those identified 'to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan' (page 15, GNDDP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and "unneeded" houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is "needed", whereby the additional or "extra" numbers are only included if actually "needed" following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

## 23431

## Object

### Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

#### Summary:

##### Housing Delivery

The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high as it will not enable the delivery of sustainable development which should prioritise the use of brownfield over greenfield sites. It is worth noting that the Government in its response to the recent Changes to the Planning System consultation appears to indicate more room for divergence from the housing needs figure derived from the standard method. Aside from stating that the current standard method will be retained with additional tweaks, this response also specifies that the standard method should not be interpreted as a "target in plan making", but rather as a "starting point" which should be considered "alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development" before making "the decision on how many homes should be planned for". The response goes on to insist on the fact that the standard method "does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (which specifically allows for a divergence from the standard method in cases where the scale of development would cause harm) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology, and instead it could be used to set lower targets due to local circumstances and constraints.

Delivery of such a large number of houses would make it difficult or even impossible to meet climate change targets, including the legally binding commitment to reach net zero by 2050, particularly as these are likely to be made more stringent during the life of the plan. If climate change is going to be the priority it should be, then the number of new houses in the plan should be kept to the legally required minimum rather than inflated to the proposed levels which are far above the legal requirement or "need". Moreover, the location of any new housing should be reviewed in light of climate change targets and legislation, so that sites are allocated in the most sustainable locations, bearing in mind the importance of environmental factors in ensuring development is sustainable in the NPPF (paragraph 8), and a plan sound.

The GNLP proposes to have 'enough committed sites to accommodate 22% more homes than "need", along with a "contingency" location for growth, should they be required to offset any non-delivery. Additional opportunities will be

provided, particularly small scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development' (Reg. 19 GNLP Delivery Statement.) Having such a high buffer of 22% makes the GNLP unsound due to this almost certain to result in failure to meet necessary climate change targets, legislation and aspirations. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.

It is important that prioritisation is given to the delivery of brownfield sites, in line with the Government's stated intentions and the need to help to address climate change. If more new allocations and windfalls outside rural settlement boundaries are permitted then it is highly likely that development will take place there rather than on urban brownfield sites, where development may not be so streamlined or cost-effective for the developer.

There is clear and compelling evidence from historic completions that windfalls are highly likely to come forward for development, with the Reg. 19 GNLP forecasting that an estimated 4,450 resulting from windfall development will come forward during the plan period, and yet only 1,296 dwellings have been included as a windfall allowance. 'As windfall delivery is likely to remain robustly high', it would be sound to include a much higher number within this allowance, thus meaning that fewer new housing allocations would be required on less sustainable greenfield rural sites. This is also further evidence that a 22% buffer is unnecessarily high.

We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan (SNVCHAA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.

We question the inclusion of a "contingency" site or sites, such as that at Costessey (Reg. 19 para. 181) for 'around 800 homes', but which we believe should also include those identified 'to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan' (page 15, GNLP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and "unneeded" houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is "needed", whereby the additional or "extra" numbers are only included if actually "needed" following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed,

along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.

It is important that the GNLP does not over-promise by allocating large numbers of sites for housing above and beyond what is "needed". It is clear from the current JCS that the targets set were too high, as with five years left of the JCS 31,452 commitments remain. To reach the GNLP target of 49,492 houses an average annual delivery rate of 2,458 would be required over the period 2020 – 2038. The average annual delivery rate for 2011 - 2020 was 1,841, which is significantly below what would be required as an annual average delivery-rate for the GNLP. It would be more sound to

set a more realistic target figure, which would be more likely to be met: this would be easier and more likely to be achieved if the target is as low as can be permitted.

Building regulations are not currently stringent enough to ensure that new buildings are carbon neutral. This issue is meant to be addressed for 2025, but there is no guarantee this will happen, and it is therefore highly likely that a significant number of the planned new dwellings would be constructed to standards that contribute to climate change. To address this, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level. Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes planned for the district.

#### **Change suggested by respondent:**

##### Housing Delivery

The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high as it will not enable the delivery of sustainable development which should prioritise the use of brownfield over greenfield sites. It is worth noting that the Government in its response to the recent Changes to the Planning System consultation appears to indicate more room for divergence from the housing needs figure derived from the standard method. Aside from stating that the current standard method will be retained with additional tweaks, this response also specifies that the standard method should not be interpreted as a "target in plan making", but rather as a "starting point" which should be considered "alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development" before making "the decision on how many homes should be planned for". The response goes on to insist on the fact that the standard method "does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (which specifically allows for a divergence from the standard method in cases where the scale of development would cause harm) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology, and instead it could be used to set lower targets due to local circumstances and constraints.

Delivery of such a large number of houses would make it difficult or even impossible to meet climate change targets, including the legally binding commitment to reach net zero by 2050, particularly as these are likely to be made more stringent during the life of the plan. If climate change is going to be the priority it should be, then the number of new houses in the plan should be kept to the legally required minimum rather than inflated to the proposed levels which are far above the legal requirement or "need". Moreover, the location of any new housing should be reviewed in light of climate change targets and legislation, so that sites are allocated in the most sustainable locations, bearing in mind the importance of environmental factors in ensuring development is sustainable in the NPPF (paragraph 8), and a plan sound.

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**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

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**23432****Object**

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**The GNLP and other local plan documents, 31**

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:****The GNLP and South Norfolk Village Clusters**

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as “final”) stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHA, and by the GNLP meeting of 10 July 2020 noting that the GNLP would ‘consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVCHA plan progresses’ (page 20, GNLP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLP Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs’ (page 20, GNLP papers, 10 July 2020.) By including the “minimum” term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a “minimum” number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHA not a “minimum” of 1,200.

Moreover, the Reg. 19 GNLP states in para. 136 that: ‘homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.’ CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters. This is supported further by the Reg. 19 GNLP Climate Change Statement which states that ‘growth in villages is located where there is good access to services to support their retention’ It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP regarding the location of housing in village clusters in South Norfolk.

It is also worth commenting on South Norfolk District Council’s Statement of Community Involvement (amended version September 2020, accessed on 18 February 2021.) Here, the emerging Local Plan is described as the GNLP (para. 39) with no reference to the SNVCHA, which is misleading and inaccurate. Also, the GNLP is described as covering the period to 2036 (para. 41), whereas it should be until 2038.

**Change suggested by respondent:**

The GNLN and South Norfolk Village Clusters

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLN as being unsound. The GNLN Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as "final") stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLN and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLN setting the overall numbers of new houses to be included in the SNVCHA, and by the GNDP meeting of 10 July 2020 noting that the GNDP would 'consider whether the "minimum" reference can be amended in the Reg. 19 version of the GNLN as the SNVCHA plan progresses' (page 20, GNDP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLN Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the "minimum" reference be considered, nor has 'evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs' (page 20, GNDP papers, 10 July 2020.) By including the "minimum" term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a "minimum" number. This potential change in housing numbers within the GNLN would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLN Table 6 states there will be 1,200 houses in the SNVCHA not a "minimum" of 1,200.

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**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23433

Object

Homes, 136

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:****The GNLP and South Norfolk Village Clusters**

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as “final”) stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHA, and by the GNLP meeting of 10 July 2020 noting that the GNLP would ‘consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVCHA plan progresses’ (page 20, GNLP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLP Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs’ (page 20, GNLP papers, 10 July 2020.) By including the “minimum” term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a “minimum” number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHA not a “minimum” of 1,200.

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**Change suggested by respondent:**

The GNLN and South Norfolk Village Clusters

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**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnl.org.uk/a/44v>

23434

Object

### Housing Growth Needs, 180

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:****The GNLP and South Norfolk Village Clusters**

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as “final”) stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHA, and by the GNLP meeting of 10 July 2020 noting that the GNLP would ‘consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVCHA plan progresses’ (page 20, GNLP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLP Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs’ (page 20, GNLP papers, 10 July 2020.) By including the “minimum” term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a “minimum” number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHA not a “minimum” of 1,200.

Moreover, the Reg. 19 GNLP states in para. 136 that: ‘homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.’ CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters. This is supported further by the Reg. 19 GNLP Climate Change Statement which states that ‘growth in villages is located where there is good access to services to support their retention’ It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP regarding the location of housing in village clusters in South Norfolk.

It is also worth commenting on South Norfolk District Council’s Statement of Community Involvement (amended version September 2020, accessed on 18 February 2021.) Here, the emerging Local Plan is described as the GNLP (para. 39) with no reference to the SNVCHA, which is misleading and inaccurate. Also, the GNLP is described as covering the period to 2036 (para. 41), whereas it should be until 2038.

**Change suggested by respondent:**

The GNLP and South Norfolk Village Clusters

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as “final”) stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHA, and by the GNDP meeting of 10 July 2020 noting that the GNDP would ‘consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVCHA plan progresses’ (page 20, GNDP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLP Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs’ (page 20, GNDP papers, 10 July 2020.) By including the “minimum” term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a “minimum” number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHA not a “minimum” of 1,200.

Moreover, the Reg. 19 GNLP states in para. 136 that: ‘homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.’ CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters. This is supported further by the Reg. 19 GNLP Climate Change Statement which states that ‘growth in villages is located where there is good access to services to support their retention’ It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP regarding the location of housing in village clusters in South Norfolk.

It is also worth commenting on South Norfolk District Council’s Statement of Community Involvement (amended version September 2020, accessed on 18 February 2021.) Here, the emerging Local Plan is described as the GNLP (para. 39) with no reference to the SNVCHA, which is misleading and inaccurate. Also, the GNLP is described as covering the period to 2036 (para. 41), whereas it should be until 2038.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23435

Object

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**Policy 7.4 Village Clusters, 382**

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:****The GNLP and South Norfolk Village Clusters**

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as “final”) stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHA, and by the GNLP meeting of 10 July 2020 noting that the GNLP would ‘consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVCHA plan progresses’ (page 20, GNLP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLP Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs’ (page 20, GNLP papers, 10 July 2020.) By including the “minimum” term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a “minimum” number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHA not a “minimum” of 1,200.

Moreover, the Reg. 19 GNLP states in para. 136 that: ‘homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.’ CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters. This is supported further by the Reg. 19 GNLP Climate Change Statement which states that ‘growth in villages is located where there is good access to services to support their retention’ It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP regarding the location of housing in village clusters in South Norfolk.

It is also worth commenting on South Norfolk District Council’s Statement of Community Involvement (amended version September 2020, accessed on 18 February 2021.) Here, the emerging Local Plan is described as the GNLP (para. 39) with no reference to the SNVCHA, which is misleading and inaccurate. Also, the GNLP is described as covering the period to 2036 (para. 41), whereas it should be until 2038.

**Change suggested by respondent:****The GNLN and South Norfolk Village Clusters**

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLN as being unsound. The GNLN Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as "final") stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLN and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLN setting the overall numbers of new houses to be included in the SNVCHA, and by the GNDP meeting of 10 July 2020 noting that the GNDP would 'consider whether the "minimum" reference can be amended in the Reg. 19 version of the GNLN as the SNVCHA plan progresses' (page 20, GNDP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLN Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the "minimum" reference be considered, nor has 'evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs' (page 20, GNDP papers, 10 July 2020.) By including the "minimum" term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a "minimum" number. This potential change in housing numbers within the GNLN would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLN Table 6 states there will be 1,200 houses in the SNVCHA not a "minimum" of 1,200.

Moreover, the Reg. 19 GNLN states in para. 136 that: 'homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.' CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters. This is supported further by the Reg. 19 GNLN Climate Change Statement which states that 'growth in villages is located where there is good access to services to support their retention' It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLN regarding the location of housing in village clusters in South Norfolk.

It is also worth commenting on South Norfolk District Council's Statement of Community Involvement (amended version September 2020, accessed on 18 February 2021.) Here, the emerging Local Plan is described as the GNLN (para. 39) with no reference to the SNVCHA, which is misleading and inaccurate. Also, the GNLN is described as covering the period to 2036 (para. 41), whereas it should be until 2038.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23436

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

### Summary:

Policy 7.5 Small Scale Windfall Housing Development

As explained above CPRE Norfolk contends that as there is no "need" for the high numbers of additional new housing, and given the generally unsustainable locations of any new housing under this policy, the policy should be considered to be unsound. Existing allocations in the JCS to be carried forward to the GNLP will allow for support of local services and the maintaining of rural vitality, without needing additional new sites within village settlement boundaries, but especially without the need for the provision of new market housing outside settlement boundaries as would be permitted under this policy. Furthermore, the very high level of current commitments, in excess of 31,000, provides developers with the flexibility that is necessary to address housing need. There can be no justification for adding in additional site options on the grounds that further flexibility is required to ensure delivery.

If, despite these concerns, the policy is included in the GNLP we feel that its wording needs to be amended to remove ambiguity and help ensure communities with greater certainty as to where new development could be permitted. This should include a clearer definition of how a proposal should "respect" the form and character of the settlement. We also suggest that developments under this policy should not be permitted where there is a made Neighbourhood Plan.

### Change suggested by respondent:

Policy 7.5 Small Scale Windfall Housing Development

As explained above CPRE Norfolk contends that as there is no "need" for the high numbers of additional new housing, and given the generally unsustainable locations of any new housing under this policy, the policy should be considered to be unsound. Existing allocations in the JCS to be carried forward to the GNLP will allow for support of local services and the maintaining of rural vitality, without needing additional new sites within village settlement boundaries, but especially without the need for the provision of new market housing outside settlement boundaries as would be permitted under this policy. Furthermore, the very high level of current commitments, in excess of 31,000, provides developers with the flexibility that is necessary to address housing need. There can be no justification for adding in additional site options on the grounds that further flexibility is required to ensure delivery.

If, despite these concerns, the policy is included in the GNLP we feel that its wording needs to be amended to remove ambiguity and help ensure communities with greater certainty as to where new development could be permitted. This should include a clearer definition of how a proposal should "respect" the form and character of the settlement. We also suggest that developments under this policy should not be permitted where there is a made Neighbourhood Plan.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23437

Object

**Infrastructure, 141****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]**Summary:**

The Norwich Western Link Road

The inclusion of this proposed road is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: 'for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' Policy 4 – Strategic Infrastructure suggests that 'a virtuous circle where clean transport is prioritised, less use is made of cars' will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in 'the end of the road? Challenging the road-building consensus' (CPRE, 2017.)

**Change suggested by respondent:**

The Norwich Western Link Road

The inclusion of this proposed road is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: 'for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' Policy 4 – Strategic Infrastructure suggests that 'a virtuous circle where clean transport is prioritised, less use is made of cars' will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in 'the end of the road? Challenging the road-building consensus' (CPRE, 2017.)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23438

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]**Summary:**

The Norwich Western Link Road

The inclusion of this proposed road is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: 'for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' Policy 4 – Strategic Infrastructure suggests that 'a virtuous circle where clean transport is prioritised, less use is made of cars' will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in 'the end of the road? Challenging the road-building consensus' (CPRE, 2017.)

**Change suggested by respondent:**

The Norwich Western Link Road

The inclusion of this proposed road is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: 'for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' Policy 4 – Strategic Infrastructure suggests that 'a virtuous circle where clean transport is prioritised, less use is made of cars' will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in 'the end of the road? Challenging the road-building consensus' (CPRE, 2017.)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23441

Object

**Evidence Base, Statement of Consultation****Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]



**Summary:****Consultation**

The GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. The papers for the meeting explain that ‘this means it will be possible to undertake further focused consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan’ (para. 2.2. GNDP Board papers, 10 July 2020.) However, at the subsequent GNDP meeting it was agreed not to hold this Reg. 18d consultation but instead to push on to the Reg. 19 consultation, thereby denying the opportunity for people, organisations and other stakeholders to comment on what was to be included in the Reg. 18d consultation. In particular, there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation. It is clear that this consultation was considered to be necessary in July 2020 and yet this consultation has not taken place, making the Reg. 19 GNLP unsound.

This lack of consultation in the form of an invitation to make representations about what the local plan ought to contain with regard to these new sites and policy amendments is in the view of CPRE Norfolk contrary to provision 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore is not legally compliant. This view is further supported by the failure of the three local authorities, Broadland District Council, South Norfolk District Council and Norwich City Council to comply with their respective Statements of Community Involvement with regard to

consultation on Local Plans, by not consulting on these significant additions and amendments to the GNLP, particularly as, unlike the current JCS, the GNLP will include policies and proposals for individual sites instead of having separate Site Allocation plans for the individual districts.

**Change suggested by respondent:****Consultation**

The GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. The papers for the meeting explain that ‘this means it will be possible to undertake further focused consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan’ (para. 2.2. GNDP Board papers, 10 July 2020.) However, at the subsequent GNDP meeting it was agreed not to hold this Reg. 18d consultation but instead to push on to the Reg. 19 consultation, thereby denying the opportunity for people, organisations and other stakeholders to comment on what was to be included in the Reg. 18d consultation. In particular, there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation. It is clear that this consultation was considered to be necessary in July 2020 and yet this consultation has not taken place, making the Reg. 19 GNLP unsound.

This lack of consultation in the form of an invitation to make representations about what the local plan ought to contain with regard to these new sites and policy amendments is in the view of CPRE Norfolk contrary to provision 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore is not legally compliant. This view is further supported by the failure of the three local authorities, Broadland District Council, South Norfolk District Council and Norwich City Council to comply with their respective Statements of Community Involvement with regard to

consultation on Local Plans, by not consulting on these significant additions and amendments to the GNLP, particularly as, unlike the current JCS, the GNLP will include policies and proposals for individual sites instead of having separate Site Allocation plans for the individual districts.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

## 23442

## Object

### What is the Local Plan?, 1

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:****Consultation**

The GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. The papers for the meeting explain that ‘this means it will be possible to undertake further focused consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan’ (para. 2.2. GNDP Board papers, 10 July 2020.) However, at the subsequent GNDP meeting it was agreed not to hold this Reg. 18d consultation but instead to push on to the Reg. 19 consultation, thereby denying the opportunity for people, organisations and other stakeholders to comment on what was to be included in the Reg. 18d consultation. In particular, there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation. It is clear that this consultation was considered to be necessary in July 2020 and yet this consultation has not taken place, making the Reg. 19 GNLP unsound.

This lack of consultation in the form of an invitation to make representations about what the local plan ought to contain with regard to these new sites and policy amendments is in the view of CPRE Norfolk contrary to provision 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore is not legally compliant. This view is further supported by the failure of the three local authorities, Broadland District Council, South Norfolk District Council and Norwich City Council to comply with their respective Statements of Community Involvement with regard to

consultation on Local Plans, by not consulting on these significant additions and amendments to the GNLP, particularly as, unlike the current JCS, the GNLP will include policies and proposals for individual sites instead of having separate Site Allocation plans for the individual districts.

**Change suggested by respondent:****Consultation**

The GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. The papers for the meeting explain that ‘this means it will be possible to undertake further focused consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan’ (para. 2.2. GNDP Board papers, 10 July 2020.) However, at the subsequent GNDP meeting it was agreed not to hold this Reg. 18d consultation but instead to push on to the Reg. 19 consultation, thereby denying the opportunity for people, organisations and other stakeholders to comment on what was to be included in the Reg. 18d consultation. In particular, there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation. It is clear that this consultation was considered to be necessary in July 2020 and yet this consultation has not taken place, making the Reg. 19 GNLP unsound.

This lack of consultation in the form of an invitation to make representations about what the local plan ought to contain with regard to these new sites and policy amendments is in the view of CPRE Norfolk contrary to provision 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore is not legally compliant. This view is further supported by the failure of the three local authorities, Broadland District Council, South Norfolk District Council and Norwich City Council to comply with their respective Statements of Community Involvement with regard to

consultation on Local Plans, by not consulting on these significant additions and amendments to the GNLP, particularly as, unlike the current JCS, the GNLP will include policies and proposals for individual sites instead of having separate Site Allocation plans for the individual districts.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

**23444****Object****Landscape, 118**

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:**

Green Belt

CPRE Norfolk contends that insufficient baseline evidence has been collected and evidence gathered to keep this under review. There has not been an examination of comprehensive and proportionate evidence for the establishment of a Green Belt for Norwich.

Para. 118 of the Reg. 19 GNLP merely states that ‘Greater Norwich does not have a nationally designated Green Belt. National Policy is clear that new Green Belts should very rarely be established. Therefore this plan will need to carry forward policies for protecting our valued landscapes.’ Instead, CPRE Norfolk argues that a thorough examination of the

evidence for a Green Belt should have been carried out and published as, although rare, the NPPF does allow for the creation of new green belts in the right circumstances.

This is in part shown by the answer to a question from CPRE Norfolk to the GNPD for their meeting of 16 December 2020. The question was:

CPRE Norfolk notes that the GNLP Reg 19 v1.4 at paragraph 117 states that: "Greater Norwich does not have a nationally designated Green Belt. National policy is clear that new Green Belts should very rarely be established. Therefore, this plan will need to carry forward policies for protecting our valued landscapes."

We are concerned that the GNLP has reached this stage without a more thorough and detailed (at least one that is available publicly) consideration of the provision of a Green Belt for Norwich, preferably on the "green wedges" model. CPRE Norfolk would like an explanation as to why the exceptional circumstances for creation of a Green Belt for Norwich as required by the NPPF do not exist.

The wholly exceptional circumstances around the current Covid-19 crisis are just one example which demonstrates not only how essential it is to maintain and protect green spaces, but also how circumstances have changed since earlier drafts of the GNLP. Moreover, the Government's proposed changes to the planning system and housing requirements suggest that more robust protection of valued green spaces is now more pressing than ever, along with the long-term need for climate change mitigation which the provision of a Green Belt would help to guarantee.

The GNLP Officer response was:

The Green Belt issue was thoroughly addressed in the Regulation 18A consultation Growth Options document. This clearly set out the national policy requirement to demonstrate exceptional circumstances to establish a new Green Belt. All responses to the consultation are included in the Draft Statement of Consultation published in September 2018. No evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional circumstances. The GNLP provides strong policies to protect green spaces and enhance green infrastructure.

Covid-19 is an exceptional circumstance nationally, it is not exceptional to the local plan area. The CPRE are correct to point out that the pandemic has reinforced the importance of green spaces, but in this respect the most significant need is for green space to be accessible. The function of Green Belts is not to provide accessible

green space; this is best provided through a green infrastructure strategy. Similarly, the function of a Green Belt is not to address climate change. Indeed, because development may need to leap-frog Green Belts, they can be detrimental to climate change by extending commutes and other travel needs. The issue may need to be reconsidered in the next local plan to address any relevant requirements of the proposed new planning system and to take account of any new settlement proposals.

The response makes clear that 'no evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional circumstances', which implies that such evidence has not been sought, and that therefore the Green Belt issue has not been thoroughly addressed by the GNPD. For the potential of a Green Belt to have been 'thoroughly addressed' as is claimed in the response, then such evidence should have been gathered for the Local Plan's body of evidence, to be considered both comprehensive and proportionate. CPRE Norfolk provides such evidence in the following section of its submission to demonstrate in part that the necessary exceptional circumstances required for an establishment of a Green Belt for Norwich, on the 'green wedges' model, do exist. It is our belief that a decision not to pursue a Green Belt for Norwich through inclusion within the draft GNLP was taken without a full assessment of the evidence having taken place, which therefore raises questions about both the legal compliance and soundness of the Plan. To address this, the evidence for a Green Belt for Norwich needs to be fully assessed and, CPRE Norfolk suggests, a Green Belt on the 'green wedges' model should be incorporated into the GNLP. This evidence is presented below in A Green Belt for Norwich? A paper by CPRE Norfolk.

## A Green Belt for Norwich? A paper by CPRE Norfolk

### 1. Summary

1.1 Unlike many major cities Norwich does not have a Green Belt, and at present the draft GNLP does not have provision for one. This is explained on the GNLP website:

- Green Belts do not stop development but move that pressure from the edges of a city to surrounding 'satellite' towns;
- under Government policy, new Green Belts can only be set up in exceptional circumstances;
- in Greater Norwich, the control of development in the countryside is done through the use of countryside protection policies – backed by Government policy, known as the National Planning Policy Framework (NPPF), the use of countryside protection policies will continue in the new local plan.

1.2 This paper sets out the reasons why a Green Belt could and should instead be considered as a key planning tool for Greater Norwich, and be introduced in the next draft of the GNLP. It will show how establishing a Green Belt in Greater Norwich would meet the tests set out in the NPPF 2019.

1.3 Part of the context for this paper is the response given to a question asked by CPRE Norfolk to the GNLP at their meeting on 16 December 2021, which in part explained that "the Green Belt issue was thoroughly addressed in the Regulation 18A consultation Growth Options document", and that "no evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional [as required by the NPPF] circumstances". If the Green Belt issue has been thoroughly addressed then CPRE Norfolk suggests that this process should have included an evidential assessment. This paper seeks to address this issue.

1.4 Greater Norwich has experienced a substantial amount of development over the last 70 years, with further growth a key part of central and local government policy in the future. This pressure to provide large amounts of new housing and other development means that the countryside around Norwich, which is one of its greatest assets and which helps define the identity of the towns and villages across the area, is at risk from urban sprawl. The current coronavirus crisis has highlighted the importance of our countryside and green spaces, and the GNLP provides an opportunity for ensuring this remains available to all citizens in the years ahead, through implementation of a Green Belt to more securely check the sprawl of Norwich than is possible with the currently proposed GNLP draft policies.

### 2. National Context

#### National Planning Policy Framework (NPPF) 2019

2.1 The NPPF sets out the Government's policy direction on planning which has at its core the aim to promote sustainable development.

2.2 The Government's position on Green Belts is set out in Chapter 13, Protecting Green Belt Land. It has retained much of the advice of the previous version of the NPPF.

2.3 The fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF 133.)

2.4 The NPPF identifies five purposes of Green Belts (NPPF 134):

- check the unrestricted sprawl of large built-up areas;
- present neighbouring towns merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration by encouraging the recycling of derelict land and other urban land.

2.5 New Green Belts should only be established in exceptional circumstances e.g. planning for larger-scale development such as new settlements or major urban extensions. In proposing a new Green Belt local planning authorities are advised to (NPPF 135):

- demonstrate why normal planning and development management policies would not be adequate;
- whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate necessity for the Green Belt and its consistency with local plans for adjoining areas; and
- show how the Green Belt would meet other objectives of the Framework.

2.6 When drawing up Green Belt boundaries the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences of channeling development towards

urban areas inside the boundary, towards towns and villages within the Green Belt or towards locations beyond the outer boundary (NPPF 138.)

2.7 When defining boundaries plans should satisfy six criteria (NPPF 139):

- ensure consistency with the development plan's strategy for meeting the identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time and permission should only be granted following an update to a plan;
- demonstrate that the boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly using physical features that are readily recognizable and likely to be permanent.

2.8 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use:

such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land (NPPF 141.)

### 3. Greater Norwich Context

3.1 Development in Greater Norwich over the last 70 years has been significant with further substantial development proposed by 2038, currently consisting of a GNLP target (Total Housing Potential) for 49,492 houses to be built during the period 2018-2038.

3.2 The location and scale of development that has already taken place has produced considerable negative impacts on the countryside around Norwich. Existing settlements such as Wymondham, Aylsham, Acle, Loddon and Wroxham have experienced substantial growth in addition to large-scale development on the edges of Norwich. In effect, new communities have been developed including those within the north-east Growth Triangle. The areas of countryside between the settlements which play such an important part in framing their character and identity have been significantly diminished.

3.3 To accommodate future development in Greater Norwich the local planning authorities are having to consider land in sensitive locations which is likely to have further significant impacts on the existing settlement pattern. For example, major site allocations are proposed at Easton, Hethersett, Cringleford, Thorpe Marriot and Hellesdon.

3.4 With high levels of further growth being planned there is a strong risk of urban sprawl and excessive encroachment into the countryside.

### 4. The Planning Case for a Green Belt for Norwich

4.1 The NPPF is very clear in setting out the approach to the establishment of new Green Belts. It identifies five purposes for Green Belts and five tests to be satisfied for designation in strategic plans (see 2.4 and 2.5 above.) This section of the

paper sets out how in CPRE Norfolk's view these tests can be met and that the GNLP authorities can and should support the principle of establishing a Green Belt and develop a detailed programme for defining a boundary.

Why normal planning and development management policies are not adequate.

4.2 In Greater Norwich the policy approach to protecting the settlement pattern and character of the area has been based on the designation of strategic gaps and landscape protection zones around the Norwich southern bypass, the protection of river valleys and other countryside protection policies such as the Joint Core Strategy's Policy 1: addressing climate change and protecting environmental assets. Whilst these policies recognise the importance of maintaining the separation of settlements, they have not been sufficiently robust in preventing the loss of land between settlements resulting in the planned virtual coalescence of for example, Hethersett and Wymondham, Hellesdon and Drayton, and Colney

and Cringleford. The GNLP currently looks to continue and expand upon these policies e.g. by enhancing green infrastructure.

4.3 In the decision-making process, particularly when there has been a shortfall in the supply of housing land, the weight of decision favours the use of land for development. Where there is a shortfall in housing land supply, Inspectors at Section 78 appeals have granted permission for development on land within these 'protected' areas (e.g. Planning Inspectorate references: APP/L2630/W/15/3007004; APP/L2630/W/16/3145810; APP/L2630/W/16/3145810.)

4.4 This suggests that the current and proposed draft GNLP policies which seek to protect the gaps between settlements are failing in their objective to prevent coalescence and sprawl.



4.5 Planning policies which seek to retain settlement character and the setting of settlements and promote green infrastructure do not carry the same status or weight as a Green Belt designation, i.e. very special circumstances do not have to be demonstrated. The designation of a Green Belt would introduce that test to protect against 'inappropriate development'.

Major changes in circumstances have made the adoption of this exceptional measure necessary

4.6 The recent months of the Coronavirus crisis have shown the importance of our green spaces, as has been demonstrated by various reports and surveys e.g. a CPRE and Women's Institute commissioned poll on attitudes to green spaces and community spirit during the lockdown (results at <https://bit.ly/3c6Yc1U>); the Wildlife Trusts' five-year review of '30 Days Wild'; a YouGov survey commissioned by CPRE and the HomeOwners Alliance (results at <https://bit.ly/36Gm1Md>.) The importance of wildlife, nature and the countryside are widely acknowledged as being beneficial to mental and even physical health, with access to green spaces being important to all. Therefore, the need to retain green spaces around Norwich and to maintain gaps between various settlements is clear, whilst acknowledging that Green Belts per se are not intended to provide better access to green spaces.

4.7 England's Green Belts were largely established in the aftermath of the Second World War when the need to stop urban sprawl and the merging of settlements was recognised, along with the need to preserve the character of historic towns and to encourage development to be within existing built-up areas. The current crisis, combined with the pressing demands of climate change are an exceptional set of circumstances that should lead to a re-calibration of priorities, with the GNLP providing the opportunity for maintaining a green setting for the historic city of Norwich and protection of important green corridors from harmful development, whilst enabling necessary development and economic growth to take place, as well as providing the opportunity for securing better access to countryside.

4.8 The pressure for development is significant. The Greater Norwich authorities are planning for 49,492 new homes by 2038 (GNLP Reg. 19), along with similarly ambitious plans to grow the economy, jobs and infrastructure. Such growth is at a historically exceptional level. The fact that 49,492 homes are being proposed for inclusion in the GNLP shows exceptionality, due to the fact that this number is 22% above the figure for housing need: if this figure was kept to the legal requirement of 40,541 plus a 5% buffer, giving a total of 42,568, this particular exceptional factor would be removed.

The consequences of the proposal for sustainable development

4.9 A Green Belt would be central to the development of a robust strategy for delivering sustainable development in Greater Norwich. The NPPF identifies three elements/objectives of sustainable development.

Economic objective

4.10 Planning should help build a strong, responsive and competitive economy. A Green Belt would form part of a strategic approach which would provide for new development opportunities. It would support the economic development of Greater Norwich by supporting the retention and enhancement of its natural environment and landscape.

Social objective

4.11 Planning should support strong and vibrant communities by providing homes in a well-designed and safe environment with accessible open spaces that promote their health, social and cultural well-being. A Green Belt would retain areas of countryside close to Norwich and other settlements, providing opportunities for recreation and promoting access to it. It would retain the identity of settlements that are highly valued by residents and support the continued regeneration of existing urban areas.

4.12 The countryside around cities and towns has a particular role to play in encouraging healthy lifestyles and wellbeing.

Green Belts provide a breath of fresh air for at least 30 million people who currently live in areas surrounded by Green Belts. The particularly strong planning controls provided by Green Belt policy provide a clear visual distinction between city/town and country on the edge of England's largest and most historic cities, and contribute to a good quality of life within them.

#### Environmental objective

4.13 Planning should protect and enhance the natural environment to help improve biodiversity and mitigate and adapt to climate change. A Green Belt designation would complement initiatives such as the Green Infrastructure Plan and Corridors.

4.14 Current planning policies exercise very little control over the management of land leading to a poor quality of environment. A Green Belt designation would provide a robust and long-term framework for developing proposals for a proactive approach to land management which could enhance the quality of the environment around Greater Norwich for the benefit of residents.

#### Necessity for the Green Belt and its consistency with the strategic local plans for adjoining areas

4.15 The case for the Green Belt has been outlined in the paragraphs above. Its designation around Norwich would be consistent with the planning policies of surrounding planning authorities as they seek to manage the impact of development adjoining their boundaries in line with their own plans.

4.16 The NPPF identifies three geographic issues in respect of achieving sustainable development.

4.17 In drawing up a boundary the consequences of channelling development towards urban areas inside the boundary needs to be considered. A Green Belt could act as a positive stimulus to investment in such areas and support the delivery of brownfield sites and the regeneration of existing residential development.

4.18 The impact on towns and villages within a defined boundary should also be considered. A Green Belt would first of all maintain a distinction between settlements. It would also not preclude some additional development to meet local housing needs but would inform decisions as to the most appropriate locations in terms of avoiding coalescence rather than as a result of ad hoc decisions.

4.19 The third issue is the impact on locations beyond the outer boundary, often referred to as leap-frogging. The nature of the proposed Green Belt on a 'green wedges' model would prevent the majority of concerns regarding leap-frogging, whilst designation would inform any discussions on which locations might be appropriate for consideration and those which would not. If the total housing potential was set at the legal requirement of 40,541 plus a 5% buffer, given the delivery already achieved 2018-20 (5,240 dwellings) and the current commitment of 31,452, the balance of 5,876 houses could be provided by a combination of windfalls and through the development of Brownfield sites in Norwich. The leapfrogging of development outwards over the green belt would not be a problem in these circumstances in fact the opposite trend would be evident with development leapfrogging in to Norwich aided by the increasing availability of redundant office and retail space in the city centre together with the availability of other large-scale sites in East Norwich and Anglia Square. Concentrating development in Norwich minimises climate change impacts and will help revitalise the city centre – an issue that will be increasingly significant over the coming years.

4.20 In the event that a Green Belt was designated for Greater Norwich and there was a need to release land to meet housing needs one would anticipate an assessment based on seeking to achieve sustainable development. In that context rather than identify sites further away from where the need arose which would generate journeys of potentially considerable length, a sequential approach would be applied i.e. by first developing existing identified brownfield sites in Norwich as suggested in 4.19 and by making use of redundant office and retail space for residential use.

## How the Green Belt would meet other objectives of the Framework

4.21 The focus of the NPPF is the delivery of sustainable development. It comprises economic, social and environmental objectives that have been addressed in the paragraphs above.

### 5. Practical Considerations

5.1 CPRE Norfolk recognises that designating a Green Belt for Greater Norwich will be challenging in terms of the time and resources required to assess where its boundaries should be and the formal process of designation through the review of the area's local plan.

5.2 The designation of a Green Belt will need to be undertaken in the context of addressing the scale and location of development to support the economy of Greater Norwich and meeting the housing needs of the area. CPRE Norfolk recognises the need to make provision for new development in bringing forward a Green Belt.

5.3 To achieve a Green Belt boundary that performs its intended functions and purposes and has the confidence and support of the public, it will be important to ensure that it is robust and can stand the test of time. How land within the Green Belt is managed will also be important. This could be achieved by making the best use of land within the existing

built-up areas, identifying and safeguarding greenfield sites for development in the future and having a positive approach to the use of land within the Green Belt.

5.4 The 'green wedges' model is an important tool in providing the benefits of a Green Belt, but without restricting the required level of growth. The boundaries of such 'wedges' could be tailored: to check the unrestricted sprawl of the margins of Norwich and its connected villages; to prevent neighbouring settlements merging into one another, such as Wymondham and Hethersett; to assist in safeguarding the countryside from encroachment, leaving it available in part as a green resource for the population; to preserve the setting and special character of historic settlements; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban, brownfield land within Norwich.

### 6. Conclusion

CPRE Norfolk's view, having considered the requirements set out in the current NPPF, is that there is a strong planning justification for the designation of a new Green Belt on the 'green wedges' model in Greater Norwich and that the practical considerations of delivering it can and should be addressed. The intention of such a Green Belt would not be to prevent development, but to ensure the location of such development also enables protection and enhancement of green spaces and countryside for the benefit of all. A thorough assessment of the evidence for a Green Belt should have been included as part of the production of the GNLP: as the Officer reply to the CPRE Norfolk question above makes clear, this evaluation of the evidence has not been carried out.

#### **Change suggested by respondent:**

##### Green Belt

CPRE Norfolk contends that insufficient baseline evidence has been collected and evidence gathered to keep this under review. There has not been an examination of comprehensive and proportionate evidence for the establishment of a Green Belt for Norwich.

Para. 118 of the Reg. 19 GNLP merely states that 'Greater Norwich does not have a nationally designated Green Belt. National Policy is clear that new Green Belts should very rarely be established. Therefore this plan will need to carry forward policies for protecting our valued landscapes.' Instead, CPRE Norfolk argues that a thorough examination of the evidence for a Green Belt should have been carried out and published as, although rare, the NPPF does allow for the creation of new green belts in the right circumstances.

This is in part shown by the answer to a question from CPRE Norfolk to the GNDP for their meeting of 16 December 2020. The question was:

CPRE Norfolk notes that the GNLP Reg 19 v1.4 at paragraph 117 states that: "Greater Norwich does not have a nationally designated Green Belt. National policy is clear that new Green Belts should very rarely be established. Therefore, this plan will need to carry forward policies for protecting our valued landscapes."

We are concerned that the GNLP has reached this stage without a more thorough and detailed (at least one that is available publicly) consideration of the provision of a Green Belt for Norwich, preferably on the "green wedges" model. CPRE Norfolk would like an explanation as to why the exceptional circumstances for creation of a Green Belt for Norwich as required by the NPPF do not exist.

The wholly exceptional circumstances around the current Covid-19 crisis are just one example which demonstrates not only how essential it is to maintain and protect green spaces, but also how circumstances have changed since earlier drafts of the GNLP. Moreover, the Government's proposed changes to the planning system and housing requirements suggest that more robust protection of valued green spaces is now more pressing than ever, along with the long-term need for climate change mitigation which the provision of a Green Belt would help to guarantee.

The GNLP Officer response was:

The Green Belt issue was thoroughly addressed in the Regulation 18A consultation Growth Options document. This clearly set out the national policy requirement to demonstrate exceptional circumstances to establish a new Green Belt. All responses to the consultation are included in the Draft Statement of Consultation published in September 2018. No evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional circumstances. The GNLP provides strong policies to protect green spaces and enhance green infrastructure.

Covid-19 is an exceptional circumstance nationally, it is not exceptional to the local plan area. The CPRE are correct to point out that the pandemic has reinforced the importance of green spaces, but in this respect the most significant need is for green space to be accessible. The function of Green Belts is not to provide accessible

green space; this is best provided through a green infrastructure strategy. Similarly, the function of a Green Belt is not to address climate change. Indeed, because development may need to leap-frog Green Belts, they can be detrimental to climate change by extending commutes and other travel needs. The issue may need to be reconsidered in the next local plan to address any relevant requirements of the proposed new planning system and to take account of any new settlement proposals.

The response makes clear that 'no evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional circumstances', which implies that such evidence has not been sought, and that therefore the Green Belt issue has not been thoroughly addressed by the GNDP. For the potential of a Green Belt to have been 'thoroughly addressed' as is claimed in the response, then such evidence should have been gathered for the Local Plan's body of evidence, to be considered both comprehensive and proportionate. CPRE Norfolk provides such evidence in the following section of its submission to demonstrate in part that the necessary exceptional circumstances required for an establishment of a Green Belt for Norwich, on the 'green wedges' model, do exist. It is our belief that a decision not to pursue a Green Belt for Norwich through inclusion within the draft GNLP was taken without a full assessment of the evidence having taken place, which therefore raises questions about both the legal compliance and soundness of the Plan. To address this, the evidence for a Green Belt for Norwich needs to be fully assessed and, CPRE Norfolk suggests, a Green Belt on the 'green wedges' model should be incorporated into the GNLP. This evidence is presented below in A Green Belt for Norwich? A paper by CPRE Norfolk.

## A Green Belt for Norwich? A paper by CPRE Norfolk

### 1. Summary

1.1 Unlike many major cities Norwich does not have a Green Belt, and at present the draft GNLP does not have provision for one. This is explained on the GNLP website:

- Green Belts do not stop development but move that pressure from the edges of a city to surrounding ‘satellite’ towns;
- under Government policy, new Green Belts can only be set up in exceptional circumstances;
- in Greater Norwich, the control of development in the countryside is done through the use of countryside protection policies – backed by Government policy, known as the National Planning Policy Framework (NPPF), the use of countryside protection policies will continue in the new local plan.

1.2 This paper sets out the reasons why a Green Belt could and should instead be considered as a key planning tool for Greater Norwich, and be introduced in the next draft of the GNLP. It will show how establishing a Green Belt in Greater Norwich would meet the tests set out in the NPPF 2019.

1.3 Part of the context for this paper is the response given to a question asked by CPRE Norfolk to the GNLP at their meeting on 16 December 2021, which in part explained that “the Green Belt issue was thoroughly addressed in the Regulation 18A consultation Growth Options document”, and that “no evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional [as required by the NPPF] circumstances”. If the Green Belt issue has been thoroughly addressed then CPRE Norfolk suggests that this process should have included an evidential assessment. This paper seeks to address this issue.

1.4 Greater Norwich has experienced a substantial amount of development over the last 70 years, with further growth a key part of central and local government policy in the future. This pressure to provide large amounts of new housing and other development means that the countryside around Norwich, which is one of its greatest assets and which helps define the identity of the towns and villages across the area, is at risk from urban sprawl. The current coronavirus crisis has highlighted the importance of our countryside and green spaces, and the GNLP provides an opportunity for ensuring this remains available to all citizens in the years ahead, through implementation of a Green Belt to more securely check the sprawl of Norwich than is possible with the currently proposed GNLP draft policies.

### 2. National Context

#### National Planning Policy Framework (NPPF) 2019

2.1 The NPPF sets out the Government’s policy direction on planning which has at its core the aim to promote sustainable development.

2.2 The Government’s position on Green Belts is set out in Chapter 13, Protecting Green Belt Land. It has retained much of the advice of the previous version of the NPPF.

2.3 The fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF 133.)

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urban areas inside the boundary, towards towns and villages within the Green Belt or towards locations beyond the outer boundary (NPPF 138.)

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paper sets out how in CPRE Norfolk's view these tests can be met and that the GNLP authorities can and should support the principle of establishing a Green Belt and develop a detailed programme for defining a boundary.

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Major changes in circumstances have made the adoption of this exceptional measure necessary

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4.10 Planning should help build a strong, responsive and competitive economy. A Green Belt would form part of a strategic approach which would provide for new development opportunities. It would support the economic development of Greater Norwich by supporting the retention and enhancement of its natural environment and landscape.

Social objective

4.11 Planning should support strong and vibrant communities by providing homes in a well-designed and safe environment with accessible open spaces that promote their health, social and cultural well-being. A Green Belt would retain areas of countryside close to Norwich and other settlements, providing opportunities for recreation and promoting access to it. It would retain the identity of settlements that are highly valued by residents and support the continued regeneration of existing urban areas.

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4.17 In drawing up a boundary the consequences of channelling development towards urban areas inside the boundary needs to be considered. A Green Belt could act as a positive stimulus to investment in such areas and support the delivery of brownfield sites and the regeneration of existing residential development.

4.18 The impact on towns and villages within a defined boundary should also be considered. A Green Belt would first of all maintain a distinction between settlements. It would also not preclude some additional development to meet local housing needs but would inform decisions as to the most appropriate locations in terms of avoiding coalescence rather than as a result of ad hoc decisions.

4.19 The third issue is the impact on locations beyond the outer boundary, often referred to as leap-frogging. The nature of the proposed Green Belt on a 'green wedges' model would prevent the majority of concerns regarding leap-frogging, whilst designation would inform any discussions on which locations might be appropriate for consideration and those which would not. If the total housing potential was set at the legal requirement of 40,541 plus a 5% buffer, given the delivery already achieved 2018-20 (5,240 dwellings) and the current commitment of 31,452, the balance of 5,876 houses could be provided by a combination of windfalls and through the development of Brownfield sites in Norwich. The leapfrogging of development outwards over the green belt would not be a problem in these circumstances in fact the opposite trend would be evident with development leapfrogging in to Norwich aided by the increasing availability of redundant office and retail space in the city centre together with the availability of other large-scale sites in East Norwich and Anglia Square. Concentrating development in Norwich minimises climate change impacts and will help revitalise the city centre – an issue that will be increasingly significant over the coming years.

4.20 In the event that a Green Belt was designated for Greater Norwich and there was a need to release land to meet housing needs one would anticipate an assessment based on seeking to achieve sustainable development. In that context rather than identify sites further away from where the need arose which would generate journeys of potentially considerable length, a sequential approach would be applied i.e. by first developing existing identified brownfield sites in Norwich as suggested in 4.19 and by making use of redundant office and retail space for residential use.

#### How the Green Belt would meet other objectives of the Framework

4.21 The focus of the NPPF is the delivery of sustainable development. It comprises economic, social and environmental objectives that have been addressed in the paragraphs above.

## 5. Practical Considerations

5.1 CPRE Norfolk recognises that designating a Green Belt for Greater Norwich will be challenging in terms of the time and resources required to assess where its boundaries should be and the formal process of designation through the review of the area's local plan.

5.2 The designation of a Green Belt will need to be undertaken in the context of addressing the scale and location of development to support the economy of Greater Norwich and meeting the housing needs of the area. CPRE Norfolk recognises the need to make provision for new development in bringing forward a Green Belt.

5.3 To achieve a Green Belt boundary that performs its intended functions and purposes and has the confidence and support of the public, it will be important to ensure that it is robust and can stand the test of time. How land within the Green Belt is managed will also be important. This could be achieved by making the best use of land within the existing

built-up areas, identifying and safeguarding greenfield sites for development in the future and having a positive approach to the use of land within the Green Belt.

5.4 The 'green wedges' model is an important tool in providing the benefits of a Green Belt, but without restricting the required level of growth. The boundaries of such 'wedges' could be tailored: to check the unrestricted sprawl of the margins of Norwich and its connected villages; to prevent neighbouring settlements merging into one another, such as Wymondham and Hethersett; to assist in safeguarding the countryside from encroachment, leaving it available in part as a green resource for the population; to preserve the setting and special character of historic settlements; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban, brownfield land within Norwich.

## 6. Conclusion

CPRE Norfolk's view, having considered the requirements set out in the current NPPF, is that there is a strong planning justification for the designation of a new Green Belt on the 'green wedges' model in Greater Norwich and that the practical considerations of delivering it can and should be addressed. The intention of such a Green Belt would not be to prevent development, but to ensure the location of such development also enables protection and enhancement of green spaces and countryside for the benefit of all. A thorough assessment of the evidence for a Green Belt should have been included as part of the production of the GNLP: as the Officer reply to the CPRE Norfolk question above makes clear, this evaluation of the evidence has not been carried out.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

23446

Object

## Introduction, 165

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

**Summary:****Future-proofing the GNLP**

The GNLP is planning for the period up to 2038 and as such should be making greater attempts to plan for the likely more demanding laws and regulations regarding climate change, which will be introduced during the life of the plan. These may come as a result of COP26 being held in November 2021, as well as the Government's increasingly loudly stated commitments around the environment and climate change, as well as a focus on utilising brownfield land as in Robert Jenrick's statement on the 'right to regenerate' made on 16 January 2021. In addition, the NPPF is due to be revised, with an interim revision already being consulted on to end on 27 March 2021. This interim revision looks to implement policy changes in response to the 'Building Better Building Beautiful Commission "Living with Beauty" report', and will also take the opportunity to make a number of environment-related changes including amendments on flood risk and climate change. The direction of travel is clear from this and to future-proof the GNLP we urge the GNLP to take this into account to ensure the soundness of the plan. While the Reg. 19 GNLP states at para. 165 that 'this local plan also provides a "direction of travel"', this is concerned with how to identify further opportunities for growth, rather than identifying opportunities for meeting current and future demands resulting from climate change targets.

This emphasis on the environment is made clear from the suggested revision to para. 8c) of the NPPF, where instead of the current descriptor for the environmental objective as being 'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy', the suggested revision is 'to protect and enhance our natural built and historic environment; including making effective use of land, improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'. This is worth quoting in full as it illustrates the subtle yet clear way the Government intends and expects planning to prioritise environmental protection and enhancement. This is carried through in the suggested revision to para. 11a) where instead of positively seeking

'opportunities to meet the development needs of their area', plan-making will be expected to 'promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects', if the proposed revisions are adopted. This should be taken into account in the GNLP, particularly regarding the number of new housing allocations, the location of new housing and the benefits from a Green Belt.

It is noted that the Reg. 19 GNLP states that: 'While the GNLP sets out plans for the additional growth needed to 2038 and identifies the best ways for establishing long-term growth, we also need to take account of the Government's commitment to simplified rules based local plans and increasing housing supply, particularly in areas with high affordability pressures, which will assist in increasing home ownership and providing for affordable rents. The GNLP does this by setting a strategy that can be sustainably added to, providing locations that can be zoned for growth, renewal and protection in the longer term, and by providing for sufficient growth to both meet currently established needs and to set us on the path to meeting the higher long-term housing needs Government aims to provide for' (para. 26.) This appears to have been added in response to the Government's proposed changes to the planning system and the recent Planning White Paper, which assumes that the required housing numbers will be increased by the new "housing algorithm", when in fact they may be reduced from the numbers required by the initial forecasts. We feel it would be more sound to wait to see what the legally required minimum in terms of housing numbers will be, rather than adding large numbers of what are currently unneeded houses in an attempt to satisfy future unknowns.

Instead, CPRE Norfolk argues that the GNLP would be better future-proofed by more clearly recognising the need to tackle climate change throughout the life of the plan through a reduction in the total number of houses to the minimum required, along with more serious consideration on environmental grounds as to the best location for this housing. This would be a more sound and responsible approach than that currently suggested in the Reg. 19 GNLP, which is to go far

beyond what is “needed”, by allocating sites for anticipated additional housing which may not be necessary.

In summary a sound ‘future proofed’ sustainable way forward that best protects the environment (nature and the landscape) and mitigates the impact of Climate Change should involve:

- Setting the total housing potential at the minimum level required through the application of the government’s standard methodology plus a 5% buffer – i.e.  $40,541 + 2,027 = 42,568$
  - Planning for the provision of the additional 5,876 houses that would be required if the minimum level was applied i.e.  $42,568 - 36,692$  (31,452 current commitments plus 5,240 already built) through concentration of development in Norwich using Brownfield sites and by converting redundant city centre retail and office space into residential usage, thereby aiding city centre regeneration. Windfalls could also make a greater contribution than currently allowed for in the draft plan (the NPPF allows for evidence-based windfalls to be included)
  - Dropping policies 7.4 Village Clusters and 7.5 Small Scale Windfall Housing Development and plans to disperse development widely over large areas of countryside from the GNLP – none of these climate threatening options are needed if the minimum housing requirement is chosen, and removing them would secure the integrity of existing settlement development boundaries, whilst still allowing for some growth where there are existing JCS allocated sites.
  - Providing a Green Belt on the Green Wedges model to protect the countryside around Norwich from urban sprawl.
  - Prioritising the provision of affordable social housing – this can best be achieved in rural areas via the use of exemption sites allocated where local housing association surveys identify a need, and should be provided by those housing associations working together with parish and town councils
  - Accepting that the phasing of development is the best way to offer the opportunity for a further 5,000 houses in the GNLP; housing that would only be needed if the 2018-based ONS household projections (which indicate that growth may be higher than predicted by the standard methodology 2014-based projections) prove to be correct. The phasing of sites is the sensible and sound way forward – sites would be made available if needed but otherwise remain undeveloped. If historic build rates are a reliable indicator of future trends it seems highly unlikely that these extra sites will be required.
  - Prioritising sites for development as part of a phased delivery plan. The use of current allocations and urban Brownfield sites, together with the conversion of redundant office and retail space for residential purposes should take precedence over development on Greenfield sites. As part of this phased delivery Brownfield sites, identified in the list of sites to accommodate the extra 5,000 houses, such as sites for 2,000 houses in East Norwich, should be scheduled for development before sites in village clusters and elsewhere in the countryside. There is no sound reason why the composition of the sites allocated to accommodate the potential for an additional 5,000 houses cannot be altered with Greenfield sites (e.g. all the new village cluster sites) being moved in to the phased 5,000 list (to be developed only if needed) with their place in the plan taken by identified Brownfield sites.
- There is no need for all sites to be made available for development at the start of the plan. The 31,452 current allocations already provide plenty of flexibility and developer choice and there is little evidence to suggest that increasing the level of allocations leads to an increase in the delivery of new housing – it is far more likely to lead to an escalation in the number of land-banked sites and would encourage developers to “cherry pick” more attractive, cheaper to develop rural sites ahead of the more sustainable, climate-friendly urban Brownfield options.

#### **Change suggested by respondent:**

Future-proofing the GNLP

The GNLP is planning for the period up to 2038 and as such should be making greater attempts to plan for the likely more demanding laws and regulations regarding climate change, which will be introduced during the life of the plan. These may come as a result of COP26 being held in November 2021, as well as the Government’s increasingly loudly stated commitments around the environment and climate change, as well as a focus on utilising brownfield land as in Robert Jenrick’s statement on the ‘right to regenerate’ made on 16 January 2021. In addition, the NPPF is due to be revised, with

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In summary a sound 'future proofed' sustainable way forward that best protects the environment (nature and the landscape) and mitigates the impact of Climate Change should involve:

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- Planning for the provision of the additional 5,876 houses that would be required if the minimum level was applied i.e. 42,568 - 36,692 (31,452 current commitments plus 5,240 already built) through concentration of development in Norwich using Brownfield sites and by converting redundant city centre retail and office space into residential usage, thereby aiding city centre regeneration. Windfalls could also make a greater contribution than currently allowed for in the draft plan (the NPPF allows for evidence-based windfalls to be included)
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**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

**23447**

**Object**

## The GNLP and other local plan documents, 26

**Respondent:** CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]

### Summary:

Future-proofing the GNLP

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- Prioritising the provision of affordable social housing – this can best be achieved in rural areas via the use of exemption sites allocated where local housing association surveys identify a need, and should be provided by those housing associations working together with parish and town councils
- Accepting that the phasing of development is the best way to offer the opportunity for a further 5,000 houses in the GNLP; housing that would only be needed if the 2018-based ONS household projections (which indicate that growth may be higher than predicted by the standard methodology 2014-based projections) prove to be correct. The phasing of sites is the sensible and sound way forward – sites would be made available if needed but otherwise remain undeveloped. If historic build rates are a reliable indicator of future trends it seems highly unlikely that these extra sites will be required.
- Prioritising sites for development as part of a phased delivery plan. The use of current allocations and urban Brownfield sites, together with the conversion of redundant office and retail space for residential purposes should take precedence over development on Greenfield sites. As part of this phased delivery Brownfield sites, identified in the list of sites to accommodate the extra 5,000 houses, such as sites for 2,000 houses in East Norwich, should be scheduled for development before sites in village clusters and elsewhere in the countryside. There is no sound reason why the composition of the sites allocated to accommodate the potential for an additional 5,000 houses cannot be altered with Greenfield sites (e.g. all the new village cluster sites) being moved in to the phased 5,000 list (to be developed only if needed) with their place in the plan taken by identified Brownfield sites.

There is no need for all sites to be made available for development at the start of the plan. The 31,452 current allocations already provide plenty of flexibility and developer choice and there is little evidence to suggest that increasing the level of allocations leads to an increase in the delivery of new housing – it is far more likely to lead to an escalation in the number of land-banked sites and would encourage developers to “cherry pick” more attractive, cheaper to develop rural sites ahead of the more sustainable, climate-friendly urban Brownfield options.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** CPRE Full Response - <https://oc2connect.gnlp.org.uk/a/44v>

## 23476

## Object

### Sprowston, Settlement Map

**Respondent:** Mr R Craggs [12893]

#### Summary:

My comments focus on Flood Risk with respect to development, and rather than repeat a lot of detail and concerns previously submitted may I refer you to similar Consultations in particular the GNLP Reg 18 Consultation dated 14 March 2020 attached for ease of reference to the email carrying this report.

I am very concerned that the excellent innovative idea of using Iterative Flood Risk Maps has not been followed through properly. The introduction of these maps did not alleviate my concerns about the defective FRA's and SFRA 's on which many developments were approved; but they are imperative to flag up at an early stage the propensity for flooding to occur and where.

It was acknowledged that these FRA's and SFRA's were defective, which makes it all the more critical for these flood risk maps to be kept up to date. Furthermore, to show these maps as greyed out as if they were not relevant to contiguous developments is blindsiding the entire purpose of prudent development, since it is vital information to ensure sustainable development. Saturated ground can extend for miles and in unforeseen direction so drainage paths known and unknown are critical as I have stressed many times.

Therefore, with reference to the Representation Form and Section 3: Soundness

I do not consider 'the plan' to be sound for achieving sustainable when maps are still not updated. I have furnished such detail from observations that even predate the Environment agency and numerous reports and indeed formal complaints concerning the non-compliance with Planning Policy Statement 25 Development and Flood Risk.

As previously described especially with regard to the NEG; these massive developments are being approved and proceeding within a massive flood plain that is close to sea level and where the tidal effect is observable for miles inland such as with the river Wensum in Norwich.

The concerns I have expressed for over two decades have not diminished, viz:

1. The threats posed by groundwater rendering the ground saturated and impeding percolation. Groundwater of course was never monitored by the Environment Agency yet the hidden and pernicious subtlety of it was known for centuries, now these consultation notes point out these facts but show little if any attempt to identify where it is or where flooding is expected to occur, refer to point 5 below.
2. More land, especially agricultural ploughed and tilled land being being developed thereby increasing run-off and reducing the acreage available for percolation.
3. The above two points contributing to increasing the misconception about SuDS actually being sustainable, together with water attenuation systems that perversely are designed to prevent flooding but can actually cause it elsewhere
4. Defective FRA's that have planned measures for exporting water off their respective sites but on to contiguous developments.
5. Iterative flood maps not updated to indicate the effects of 1 to 4 above.

Much more detail is stated in my previous reports and it dismays me that such much land has been approved for development when the FRA's and SFRA's that were used to approve these planning applications were known to be defective and consultation on PPS 25 with local residents were refused.

#### Patently Obvious Conclusions

These problems are not new or confined to GNLP but are evident in many parts of England as is well known and where hugely expensive "too late" measures create devastation on an increasingly frequent basis.

As for homes being subjected to flooding these are invariably (but by no means exclusively) 'existing homes' that lack the defences new homes can plan for.

#### Recommendations:

Lessons learned from lessons developers refused to learn, suggest that developers should be required to contribute to compensation funds for inevitable consequences rather than the burden falling on to others who warned them. The justification for this recommendation rests on the fact that these Developers were left to undertake their own FRA's and who refused to allow scrutiny of what they considered was appropriate. In effect they have been left to set their own

homework a prerequisite of this is that they accept full responsibility.

#### Change suggested by respondent:

Lessons learned from lessons developers refused to learn, suggest that developers should be required to contribute to compensation funds for inevitable consequences rather than the burden falling on to others who warned them. The justification for this recommendation rests on the fact that these Developers were left to undertake their own FRA's and who refused to allow scrutiny of what they considered was appropriate. In effect they have been left to set their own homework a prerequisite of this is that they accept full responsibility.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** None

## 23477

## Object

### Site Assessment Booklets and Studies, Strategic Flood Risk Assessment (SFRA) Level 2

**Respondent:** Mr R Craggs [12893]

#### Summary:

My comments focus on Flood Risk with respect to development, and rather than repeat a lot of detail and concerns previously submitted may I refer you to similar Consultations in particular the GNLP Reg 18 Consultation dated 14 March 2020 attached for ease of reference to the email carrying this report.

I am very concerned that the excellent innovative idea of using Iterative Flood Risk Maps has not been followed through properly. The introduction of these maps did not alleviate my concerns about the defective FRA's and SFRA 's on which many developments were approved; but they are imperative to flag up at an early stage the propensity for flooding to occur and where.

It was acknowledged that these FRA's and SFRA's were defective, which makes it all the more critical for these flood risk maps to be kept up to date. Furthermore, to show these maps as greyed out as if they were not relevant to contiguous developments is blindsiding the entire purpose of prudent development, since it is vital information to ensure sustainable development. Saturated ground can extend for miles and in unforeseen direction so drainage paths known and unknown are critical as I have stressed many times.

Therefore, with reference to the Representation Form and Section 3: Soundness

I do not consider 'the plan' to be sound for achieving sustainable when maps are still not updated. I have furnished such detail from observations that even predate the Environment agency and numerous reports and indeed formal complaints concerning the non-compliance with Planning Policy Statement 25 Development and Flood Risk.

As previously described especially with regard to the NEG; these massive developments are being approved and proceeding within a massive flood plain that is close to sea level and where the tidal effect is observable for miles inland such as with the river Wensum in Norwich.

The concerns I have expressed for over two decades have not diminished, viz:

1. The threats posed by groundwater rendering the ground saturated and impeding percolation. Groundwater of course was never monitored by the Environment Agency yet the hidden and pernicious subtlety of it was known for centuries, now these consultation notes point out these facts but show little if any attempt to identify where it is or where flooding is expected to occur, refer to point 5 below.

2. More land, especially agricultural ploughed and tilled land being being developed thereby increasing run-off and reducing the acreage available for percolation.
3. The above two points contributing to increasing the misconception about SuDS actually being sustainable, together with water attenuation systems that perversely are designed to prevent flooding but can actually cause it elsewhere
4. Defective FRA's that have planned measures for exporting water off their respective sites but on to contiguous developments.
5. Iterative flood maps not updated to indicate the effects of 1 to 4 above.

Much more detail is stated in my previous reports and it dismays me that such much land has been approved for development when the FRA's and SFRA's that were used to approve these planning applications were known to be defective and consultation on PPS 25 with local residents were refused.

#### Patently Obvious Conclusions

These problems are not new or confined to GNLP but are evident in many parts of England as is well known and where hugely expensive "too late" measures create devastation on an increasingly frequent basis.

As for homes being subjected to flooding these are invariably (but by no means exclusively) 'existing homes' that lack the defences new homes can plan for.

#### Recommendations:

Lessons learned from lessons developers refused to learn, suggest that developers should be required to contribute to compensation funds for inevitable consequences rather than the burden falling on to others who warned them. The justification for this recommendation rests on the fact that these Developers were left to undertake their own FRA's and who refused to allow scrutiny of what they considered was appropriate. In effect they have been left to set their own homework a prerequisite of this is that they accept full responsibility.

#### Change suggested by respondent:

Lessons learned from lessons developers refused to learn, suggest that developers should be required to contribute to compensation funds for inevitable consequences rather than the burden falling on to others who warned them. The justification for this recommendation rests on the fact that these Developers were left to undertake their own FRA's and who refused to allow scrutiny of what they considered was appropriate. In effect they have been left to set their own homework a prerequisite of this is that they accept full responsibility.

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

24361

Object

**Policy 0307/0327, 0307/0327 Policy****Respondent:** Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]**Summary:**

Cringleford Parish Council: Response to Greater Norwich Local Plan Summary

- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford on the grounds of Soundness and Lack of Compliance with the Duty to Cooperate.
- The GNLP has not taken into consideration biodiversity or the changing economic environment when considering its proposals for our Parish.
- The GNLP has ignored Government, Local and its own most recent documents in formulating its proposals.
- There are no net gains in the proposals for Cringleford.
- The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford.

See attachment for full submission.

**Change suggested by respondent:****Soundness**

Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.

**Duty of Co-operation**

There is no reasoning provided for the uplift in the number of houses allocated to our parish in the GNLP. Evidence that local concerns have been discussed collaboratively, listened to, and acted upon is required. Our Neighbourhood Plan accepts the need for development and was the result of consultation with our parishioners. A parish council is the conduit for the voice of local people to be heard at county and national level. A clear audit trail with evidence is required to demonstrate co-operation has occurred, potentially resulting in amendments being made to the housing requirements in Cringleford within the GNLP (or any plan for housing development).

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/4wb>

24363

Object

**Cringleford, 3.24****Respondent:** Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]**Summary:**

Cringleford Parish Council: Response to Greater Norwich Local Plan Summary

- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford on the grounds of Soundness and Lack of Compliance with the Duty to Cooperate.
- The GNLP has not taken into consideration biodiversity or the changing economic environment when considering its proposals for our Parish.
- The GNLP has ignored Government, Local and its own most recent documents in formulating its proposals.
- There are no net gains in the proposals for Cringleford.
- The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford.

See attachment for full submission.

**Change suggested by respondent:****Soundness**

Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.

**Duty of Co-operation**

There is no reasoning provided for the uplift in the number of houses allocated to our parish in the GNLP. Evidence that local concerns have been discussed collaboratively, listened to, and acted upon is required. Our Neighbourhood Plan accepts the need for development and was the result of consultation with our parishioners. A parish council is the conduit for the voice of local people to be heard at county and national level. A clear audit trail with evidence is required to demonstrate co-operation has occurred, potentially resulting in amendments being made to the housing requirements in Cringleford within the GNLP (or any plan for housing development).

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/4wb>

24364

Object

**Cringleford, 3.25****Respondent:** Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]**Summary:**

Cringleford Parish Council: Response to Greater Norwich Local Plan Summary

- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford on the grounds of Soundness and Lack of Compliance with the Duty to Cooperate.
- The GNLP has not taken into consideration biodiversity or the changing economic environment when considering its proposals for our Parish.
- The GNLP has ignored Government, Local and its own most recent documents in formulating its proposals.
- There are no net gains in the proposals for Cringleford.
- The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford.

See attachment for full submission.

**Change suggested by respondent:****Soundness**

Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.

**Duty of Co-operation**

There is no reasoning provided for the uplift in the number of houses allocated to our parish in the GNLP. Evidence that local concerns have been discussed collaboratively, listened to, and acted upon is required. Our Neighbourhood Plan accepts the need for development and was the result of consultation with our parishioners. A parish council is the conduit for the voice of local people to be heard at county and national level. A clear audit trail with evidence is required to demonstrate co-operation has occurred, potentially resulting in amendments being made to the housing requirements in Cringleford within the GNLP (or any plan for housing development).

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/4wb>



24362

Object

**Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets****Respondent:** Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]**Summary:**

Cringleford Parish Council: Response to Greater Norwich Local Plan Summary

- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford on the grounds of Soundness and Lack of Compliance with the Duty to Cooperate.
- The GNLP has not taken into consideration biodiversity or the changing economic environment when considering its proposals for our Parish.
- The GNLP has ignored Government, Local and its own most recent documents in formulating its proposals.
- There are no net gains in the proposals for Cringleford.
- The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford.

See attachment for full submission.

**Change suggested by respondent:****Soundness**

Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.

**Duty of Co-operation**

There is no reasoning provided for the uplift in the number of houses allocated to our parish in the GNLP. Evidence that local concerns have been discussed collaboratively, listened to, and acted upon is required. Our Neighbourhood Plan accepts the need for development and was the result of consultation with our parishioners. A parish council is the conduit for the voice of local people to be heard at county and national level. A clear audit trail with evidence is required to demonstrate co-operation has occurred, potentially resulting in amendments being made to the housing requirements in Cringleford within the GNLP (or any plan for housing development).

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/4wb>

24365

Object

**Cringleford, 3.26****Respondent:** Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]**Summary:**

Cringleford Parish Council: Response to Greater Norwich Local Plan Summary

- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford on the grounds of Soundness and Lack of Compliance with the Duty to Cooperate.
- The GNLP has not taken into consideration biodiversity or the changing economic environment when considering its proposals for our Parish.
- The GNLP has ignored Government, Local and its own most recent documents in formulating its proposals.
- There are no net gains in the proposals for Cringleford.
- The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford.

See attachment for full submission.

**Change suggested by respondent:****Soundness**

Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.

**Duty of Co-operation**

There is no reasoning provided for the uplift in the number of houses allocated to our parish in the GNLP. Evidence that local concerns have been discussed collaboratively, listened to, and acted upon is required. Our Neighbourhood Plan accepts the need for development and was the result of consultation with our parishioners. A parish council is the conduit for the voice of local people to be heard at county and national level. A clear audit trail with evidence is required to demonstrate co-operation has occurred, potentially resulting in amendments being made to the housing requirements in Cringleford within the GNLP (or any plan for housing development).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/4wb>

24449

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

It is considered that Policy 6 does not propose an effective or justified strategy for the economy of rural areas. Policy 6 states that the needs of small, medium and start-up businesses are addressed through the provision of small-scale business opportunities in all significant residential and commercial developments. Additionally, the policy goes on to state that the promotion of creative industries will be focused on the city center. It is considered that this policy approach is not appropriate for the rural hinterland that composes two of the three relevant districts. Paragraph 83 of the NPPF states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed new buildings. Paragraph 84 of the NPPF goes on to state that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. Paragraph 84 also states that sites that are physically well related to existing settlements should be encouraged where suitable opportunities exist.

Policy 6, therefore is not consistent with national policy due to this inherent conflict with paragraphs 83 and 84 of the NPPF. Policy 6 directs employment generating uses to existing allocations and the city center, ignoring the needs of the rural communities resulting in an unjustified strategy for supporting rural vitality. As such the GNLP is considered to be unsound in relation to the provision of employment generating uses in rural communities.

**Change suggested by respondent:**

It is considered that either policy 6 needs to be reworded, or a new policy dedicated towards employment generating uses in rural locations be provided. At present, the more rural settlements will miss out on the potential for windfall development which could serve to boost local economic vitality. It is considered the creation of employment generating uses in rural locations on a small scale would provide local people with local jobs, helping to reduce carbon emissions from commuting, whilst also reflecting the current trend of home working and the proliferation of new start-up businesses that have arisen over the last year during the pandemic.

For example, taking the sustainable settlement of Ashby St Mary and Thurston, it is considered that some small employment generating uses here would supplement the vitality of the settlement, in accordance with the aspirations of paragraphs 83 and 84 of the NPPF. If policies are not reworded to be more flexible, then dedicated allocations should be considered, such as those proposed between Norwich Road and Mill Road as part of the 4 hectare allocation. Furthermore, due to the more rural location, employment land here would be highly attractive for the more creative and tech industries, which would normally not want to be located on busy commercial parks. Instead the opportunity to create a small network of smaller scale employment sites would better reflect the economic composition of the locality where there is an abundance of entrepreneurial spirit and the surge in consumer demand for more bespoke and local produce.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24450

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Policy 7.5 of the GNLP is not sound as it is too restrictive regarding windfall development. The policy only allows for a blanket approach of either 3 or 5 dwellings to be built, irrespective of how sustainable a settlement is, or local need, meaning the proposed strategy is ineffective.

This approach is in direct conflict with paragraph 77 of the NPPF where it states that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local need. Furthermore, paragraph 68 of the NPPF states that Local Authorities should support the development of windfall sites through their policies and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes.

Policy 7.5 of the GNLP does not support the development of windfall sites, but actively restricts development, potentially undermining viability and ensuring no affordable housing or other obligations are sought, by limiting development to a number far below policy thresholds. As such, it is considered that Policy 7.5 of the GNLP is not compliant with national policy either, conflicting with paragraph 35 of the NPPF.

Overall the policy is considered to propose an ineffective strategy for handling development, based on an unjustified strategy in conflict with national policy. Therefore the plan is considered to be unsound.

### Change suggested by respondent:

To make the policy and plan sound, it is recommended that a more flexible approach be adopted regarding windfall developments, stating that proposed development, except where allocated, may not result in more than a certain percentage of existing dwellings be proposed over the plan period. This way the policy would allow for larger settlements supporting substantially more than smaller hamlets, whilst applying a more individualistic approach reflecting the respective settlement hierarchy.

The major issue with Policy 7.5 regarding its effectiveness is that it is too generic and does not take into consideration the specific circumstances of sustainable settlements. Taking Ashby St Mary and Thurston for example, the settlement boasts local amenities and sustainable transport options, yet no growth is proposed. Instead policy 7.5 would see the settlement overly restricted, which would strangle the existing weak (in the wake of Covid and Brexit) local economy. Here policy 7.5 would only allow for the development of only 3 dwellings, which is not sustainable, nor encouraging necessary growth to facilitate rural vitality in accordance with national policies. As such, it is considered necessary that if the policy is not reworded, then specific allocations should be proposed, such as the 4 hectare site (proposing a mixed use development that would infill between the two roads (Norwich Road and Mill Road) or the 1 hectare site that adheres to the existing linear development along Mill Road, opposite where dwellings have already been granted (Applicati

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23946

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Peter Cutting [19973]**Summary:**

My comments on the GNL

1. The Norwich Western Link Road should not be in plan
  - a) not compatible with planned carbon reduction objectives
  - b) insurmountable planning issues to overcome with Wensum SAC and Habitats Regulations
2. The plan is UNSOUND in the way that it has no coherent policy on climate change, and has no carbon budget for the area
3. The plan is UNSOUND in massively ramping up housing numbers, beyond what the Govt are requiring, and beyond what is environmental sustainable
4. It is UNSOUND as the plan is not balanced "sustainable development" and not consistent with UN Sustainable Development goals to protect the environmental whilst bringing social and economic gains
5. It is UNSOUND in the lack of a comprehensive and detailed evaluation on the impact of these developments on water demand, the effect on the aquifer and dry weather river flows

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23924

Support

**CC2, Policy CC2****Respondent:** Dacre Property Holdings [18117]**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]**Petition:** 2 petitioners**Summary:**

On behalf of our clients, Dacre Property Holdings, we support the proposed allocation of Policy CC2, within the Pre-Submission (Regulation 19) Greater Norwich Local Plan.

Our client acknowledges that the wording of the current allocation (CC2) has been carried forward from the Adopted Development Plan, and representations made at Regulation 18C stage, regarding the eastern part of the site (attached for ease of reference) have been incorporated within the Regulation 19 version of the GNLP.

Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the suggested uses within the proposed site allocation (i.e. residential development of a minimum of 20 homes, while commercial, offices and/or educational uses may also be suitable).

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23925

Support

**R1, R1 Policy****Respondent:** Dacre Property Holdings [18117]**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]**Petition:** 2 petitioners**Summary:**

On behalf of our clients, Dacre Property Holdings, we support the proposed allocation of Policy R1 within the Pre-Submission (Regulation 19) Greater Norwich Local Plan.

Our client acknowledges that the allocation has been carried over from the Adopted Development Plan (Policy R1), and accepts most of the changes to the wording of the policy introduced by the GNLP. Our client would like to suggest amendments to the policy wording, to ensure soundness.

Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the suggested uses within the proposed site allocation.

**Change suggested by respondent:**

Amendment 1: The GNLP allocation specifies that the site is allocated for employment and light industrial uses only within use classes E(giii) and B2/B8, and some ancillary office development and motor trade / car sales uses on frontage with Hall Road. Class E was introduced last year with the aim of enabling maximum flexibility for units to change between use classes without requiring planning consent. With this in mind, our client suggests that the use classes permitted to operate at the site is expanded appropriately to include Class E(gi), (gii) and (a).

Amendment 2: The GNLP allocation requires the development to make provision for off-site improvements to the junction of Hall Road and The Neatmarket, caused by increased traffic generation from the site. At present, the existing allocation only requires appropriate vehicular access to be provided to serve the development proposed from Hall Road. The GNLP allocation should be reworded here to match the existing allocation, as the works required to implement a suitable access to the site will be established at the planning application stage.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23684

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** The Norwich Society (Laura Davey, Coordinator) [19930]**Summary:**

In one specific respect, Policy 3 fails to be consistent with national policy (as expressed in the current National Planning Policy Framework) and the Plan is unsound to that degree.

The clear requirement of the NPPF is that developments which will cause substantial harm to a designated heritage asset should be refused, unless it can be demonstrated that this is “necessary to achieve other substantial public benefits that outweigh that harm” (paragraph 195). In effect, the potential harm has to be necessary, that is to say unavoidable, before the merits of any substantial public benefits can kick in and this policy test can be passed.

The current wording selected for Policy 3 turns this presumption on its head. Now, the claimed existence of “overriding benefits” can be used to trump the duty of “avoiding harm”. The ‘necessity’ rule in the NPPF is no more. A simple reading of the proposed policy suggests that the prospect of an “overriding benefit” could be used legitimately to justify a heritage harm or loss, whether that harm or loss was actually avoidable or not.

**Change suggested by respondent:**

Policy 3 should be redrafted to make it consistent with the terms of national policy and re-introduce the test of necessity required by paragraph 195 of the NPPF.

Bullet point 2 might simply read:

“avoiding harm to designated and non-designated heritage assets and historic character”.

If the Policy wishes to continue to highlight the potential benefit of new development within this historic built environment, then the text could add:

“ Developments which will cause harm to heritage assets and historic character will be refused unless it can be demonstrated that this is necessary in order to achieve other essential and substantial public benefits that could not be achieved by other means, and those benefits will outweigh the harm”.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None



23398

Object

**Loddon and Chedgrave, Settlement Map****Respondent:** Mr Glyn Davies [19834]**Summary:**

The Settlement Boundary for Loddon and Chedgrave is out-of-date and needs amending to reflect the current situation. Outline planning permission was granted in 2018 (ref. 2018/1553) and Reserved Matters approval in 2020 (ref. 2019/1950) for 5 dwellings on land at the junction of Pits Lane and Hardley Road, Chedgrave. These dwellings are now under construction. As drawn/proposed, the Settlement Boundary excludes these and the neighbouring dwellings on Pits Lane. In the interests of proper planning and ensuring that the Local Plan is sound, the Settlement Boundary ought to be amended to include these dwellings in this part of the village.

**Change suggested by respondent:**

The settlement boundary needs redrafting to incorporate the recently permitted bungalows, and the adjoining dwellings within it. Otherwise there will be part of the village in the plan area, that is both physically and visually connected to the settlement that is excluded from it, for no logical planning reasons.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** Pits Lane Hardley Road Reserved Matters Site Plan.pdf - <https://oc2connect.gnlp.org.uk/a/44t>

24485

Object

**The Road Network, 83****Respondent:** Broadland Green Party (Jan Davis, Coordinator) [19650]**Summary:**

The claim in Reg19, 83 claims "mitigating the effects of climate change within the Greater Norwich area is a cornerstone of the GNLP".

**Change suggested by respondent:**

This statement is clearly not true. The Plan needs revision.

**Legally** No**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** None

24483

Object

## Addressing Climate Change, Climate Change Statement

**Respondent:** Broadland Green Party (Jan Davis, Coordinator) [19650]

### Summary:

Carbon footprint

The GNLP Reg 19 draft plan is neither sound nor legally compliant. It provides no effective modelling of baseline carbon emissions for the plan area and how to reduce them by 2038. What, for example, is the proposed house building carbon footprint between 2018 and 2038? There is no measure or target for this key parameter so how will you monitor?

The Plan needs to address how carbon emissions are to be reduced. It does not effectively do this.

A clear process needs to be included on how to assess and monitor carbon emissions so that progress, or lack of progress, can be monitored and publicised so that effective mitigation actions can be taken.

Planning and Compulsory Purchase Act 2004 requires, by law, robust climate change policies in local plans. Such climate change policies should be consistent with national policy. NPPF 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”.

Local Plans must also be in line with the objectives and provisions of the Climate Change Act 2008. The “Climate Change Statement” at Reg 19, 157, does not constitute a holistic strategic policy on climate change and the reduction of carbon emissions.

Hence, without an overriding strategic policy on how climate change will be addressed within the GNLP the plan is neither effective nor sound.

### Change suggested by respondent:

A clear process needs to be included on how to assess and monitor carbon emissions so that progress, or lack of progress, can be monitored and publicised so that effective mitigation actions can be taken.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24484

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Broadland Green Party (Jan Davis, Coordinator) [19650]**Summary:**

Norwich Western Link (NWL) Road

NWL is assumed as infrastructure that will be delivered under Policy 4. However, such a major piece of infrastructure needs to be tested for compliance with climate change policies and carbon footprint.

The NWL must be tested for soundness on several issues:

- Compliance with national policy on climate change and international obligations under the Paris Agreement under strategic Policy 4, and plan "ambitions" to reduce carbon emissions.
- Any adverse effect on the integrity of sites protected under the Habitats Regulations Directive, especially under strategic Policy 4.
- Land allocation for the construction of the NWL.

The GNLP is not sound on any of these counts. Therefore, the inclusion of the NWL in the GNLP is unsound and not consistent with national policy to reduce transport emissions by 70% by 2035.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23474

Object

**Policy 0605, 0605 Policy****Respondent:** Mrs Jessica Davis [19884]**Summary:**

Whilst I do not object to the homes being built. I do object to the access being via stringers lane.

**Change suggested by respondent:**

The access to the new homes needs to be less invasive to this area.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23300

Object

**Aylsham, 4.5****Respondent:** Mr Toby de Ville Shaw [19818]**Summary:**

The decision to build 550 more homes will put increased pressure on the infrastructure of this small medieval market town. The town centre and its narrow streets struggle to cope now with the dramatic increase in traffic from the more recent developments. Side streets such as Penfold Street, Oakfield Road and White Hart Street have little or no pavements. Increased traffic makes it dangerous for disabled residents and children and families when walking. This is a real problem for residents. This allocation is also in conflict with points 132 and 136 of the GNLP's strategy.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn from Reg.19. Consultation should also be introduced with Town Council for the first site, in respect of the infrastructure needs of the town.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23301

Object

**Aylsham, 4.1****Respondent:** Mr Toby de Ville Shaw [19818]**Summary:**

Reg. 18 put forward one site for Aylsham with 300 homes. There has been no consultation in respect of Reg. 19 where there are two sites 550 homes, an increase of 83% on the homes consulted upon in Reg. 18. This is not legally compliant with LPA's Statement of Community Involvement [SCI], 1.6 Paragraph 155 of the National Planning Policy Framework (2012) and Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate ]

**Change suggested by respondent:**

The second site put forward in Reg 19 for Aylsham should be withdrawn as the decision is not legally compliant due to a failure of consultation.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23302

Object

**Aylsham, 4.4****Respondent:** Mr Toby de Ville Shaw [19818]**Summary:**

The plan is not positively prepared or justified in respect of allocating two sites and 550 homes without consideration of the infrastructure needs of the town, which are under strain from two recent developments of 550 new homes. To have one site under Reg.18 would have created problems, to have two sites magnifies the issue of infrastructure. There are problems of water supply and sewage disposal, the road network through the town will not cope with the extra traffic generated, the health and social care system and the education system will not cope with a population increase of 20%.

**Change suggested by respondent:**

The second site for Aylsham under Reg. 19 should be withdrawn.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23552

Object

**Coltishall, Horstead etc., 6.26****Respondent:** Coltishall Primary School (Mr Colin Dean, Chair of Governors) [19902]**Summary:**

The governors of Coltishall Primary school acknowledge the factual accuracy of the statement that the school site is not landlocked, but want to note that any extension to the site would go beyond the settlement boundary. Additionally, the governing body do not support expansion of the school as in practical terms there is very little expansion possible without doubling the size of the school. We believe there is insufficient demand for this level of expansion even with additional housing; the governors do not support expansion on this scale due to the significant impact on the school community and learning environment.

**Change suggested by respondent:**

The governors of Coltishall Primary School would like to see the removal of the reference to expanding Coltishall Primary School. It sets the unrealistic expectation that for the scale of housing development being proposed for the parish, the school could be expanded onto adjacent land. As the scale of housing development to warrant expanding the school would need to be very large, all available new school sites would need to be assessed if such a proposal was ever made and therefore the current availability of land next to the school is irrelevant.

**Legally** Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23244

Object

**Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets****Respondent:** Mr Alan Dempsey [17658]**Summary:**

Refers to GNLP2149 - Blofield

I believe that the Local Plan as published is unsound because references to Area GLNP2149 appears to suggest that it is an area remaining under consideration for potential future development.

Area GLNP2149 has been subject to a planning application (Ref: 20181043, dated 20 June 2018). This application was refused by notice on 15 August 2018.

An appeal was lodged (Ref: APP/K2610/W/19/3220992) and was subject to an exhaustive review and investigation following which the decision to dismiss was made and published on 09 May 2019.

The Appeal Decision to dismiss confirmed that area is outside of the current defined settlement limit, determined that development would; 'effect on the character and appearance of the area.'

Specifically; 'would comprise a significant harmful incursion of piecemeal housing development within a valuable belt of natural vegetation which helps shield the defined built-up area of this part of Blofield from the adjacent major road,' and 'would have a detrimental impact on the landscape setting of this part of the village and be of significant harm to the character and appearance of the area.'

The decision also comments that the proposed development would; 'encroach in a rather incongruous fashion beyond the straight edge of the defined settlement boundary and in to an area of naturalised vegetation that joins and augments the narrower tree belt alongside the busy A47 dual carriageway trunk road.' Any access would require; 'an extension to a quite long and very narrow private access currently serving four houses.'

Other submissions suggesting minor adjustments to access from the main road would somehow make access suitable and compliant are simplistic and ignorant of many other factors which make this access to any further development wholly unsuitable.

**Change suggested by respondent:**

This submission recommends that area GLNP2149 be more clearly defined as outside the Blofield settlement limit and all references to area GLNP2149 be removed from the planning documentation as its presence suggests it remains an area identified for potential future development and contrary to reasons defined within the Appeal Decision (Ref: APP/K2610/W/19/3220992).

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23558

Support

**What is the Local Plan?, 1****Respondent:** Mr Jerry Dicks [19899]**Summary:**

To hopefully protect all parties interests .

**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23559

Object

**What is the Local Plan?, 2****Respondent:** Mr Jerry Dicks [19899]**Summary:**

As far as we understand local people were not consulted on all aspects of proposed development in aylsham.

**Change suggested by respondent:**

The amount of housing proposed for a small town like aylsham seems excessive and should be reduced as our infrastructure will not cope.

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** None

23826

Object

**Policy 0378R/2139R, 0378R/2139R Policy****Respondent:** Mrs Claudia Dickson [19484]**Summary:**

The sites GNLP2139R and GNLP00378R put forward in the Regulation 19 consultation are not the sites that were included in the Regulation 18 consultation. In the Reg 18 consultation they were both for 100 houses, 200 in total. The Regulation 19 is for at least 340 houses.

The total land area needed for both sites has increased by 70%, from 7.5ha per site to 25.5ha in total. The residents of Acle have had no consultation about the increased loss of green space at the edge of their village.

**Change suggested by respondent:**

This part of the plan should be what was consulted on. It cannot be legal to consult on one proposal and then amend it after the consultation to show something else.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Acle.pdf - <https://oc2connect.gnlp.org.uk/a/46g>

24090

Object

**Policy 0102, 0102 Policy****Respondent:** Diss Town Council (Mrs Sarah Richards, Town Clerk) [14137]**Summary:**

Thank you for the opportunity to submit a representation on the Regulation 19 version of the emerging GNLP.

Our representation concerns Policy GNLP0102 – the land allocated for residential development at Frontier Agriculture Ltd, Sandy Lane, Diss. As you know, it was our intention to allocate this site in the Diss and District Neighbourhood Plan as part of the DDNP's aim to meet fully the indicative housing requirement of 400. Although we feel that Planning Practice Guidance supports its inclusion in the DDNP, we have accepted the GNDP explanation that the GNLP needs to include the allocation by virtue of it being brownfield land and adjacent to the railway station.

Diss Town Council is, however, concerned that there is no provision for the necessary footway although it was included in your first draft policy issued in December 2019 but not in the later document dated January 2021.

The connection of these footways is essential for the safety of pedestrians going to the town centre or taking children to schools as all alternative routes are much further. The town council's support for this site has always been and remains contingent on the provision of a footway connecting the frontage of the Frontier site to Frenze Hall Lane.

We are aware of the argument that you cannot expect a developer to provide a facility that is on 3rd party land, but this has happened regularly over the last 20 years in Diss. In fact, the provision of a footway from Frenze Hall Lane under the railway bridge and onto Sandy Lane was conditioned as part of the ongoing development by the Persimmons Orchard Croft development and is well outside the site frontage and on 3rd party land. This is confirmed on the two plans we have attached.

The improvements adding a footway from Frenze Hall Lane under the railway bridge and onto Sandy Lane are as shown on the Persimmons plans FHL-PL101 and conceptual traffic management FHL CIV 002 and were intended as the first step to connecting to a foot/cycleway when the Frontier site is developed.



In addition, this route along Sandy Lane is part of the walking and cycling corridor in the Strategic Network review put forward by Norfolk County Council in 2020 and should be improved for this reason alone.

We have enclosed an attachment which shows the 40/50m of footway link required to give a safe route to the schools in Diss. Also attached are 3 further diagrams which compare the shortest safe routes to the Infant/Nursery school, the Junior school and High school if the footway in front of the Frontier site is connected to the Frenze Hall Lane footway compared to the shortest alternative route. We are aware that the agent for this site says that the pedestrian route over the railway bridge is a shorter route than the alternative routes we have shown but this does not take account of all the people they are expecting to use the route. Whilst it may be suitable for some high school children it is a completely unacceptable route for younger children, mothers with push chairs and those less abled.

You will see with the much longer distances involved in following a safe route to schools from housing on the Frontier site, unescorted children and mothers with young children will almost certainly opt to walk in the road where there is no footpath.

We also think it is important to point out that the Sandy Lane employment area is the largest in Diss and if we are to discourage the use of motor vehicles that this link is also essential for residents living to the west of the railway bridge to be able to walk to work.

As a responsible Town Council, we cannot support or condone any planning application that does not mitigate for the safety of pedestrians. The Government's [www.nidirect.gov.uk](http://www.nidirect.gov.uk) website contains a caveat which we fully support,

"Walking to school is a great method of transportation for children whose schools are located within a reasonable distance. It improves children's health and allows them to travel independently - but their safety and security is vital". This sums up the Diss Town Council concerns.

In this area this is particularly relevant for child pedestrians, wheelchair users, push chair users and the elderly who might normally find it difficult to move out of the way of approaching vehicles on this narrow road without a footway.

There is rough verge between the fenced off railway line and the road that is between 1.3m and 1.4m wide so there is absolutely no reason why the 1.5m footway under the railway bridge could not be extended for the 40/50m to the frontage of the Frontier site as a minimum.

It is also worth bearing in mind that if Government is serious about reducing the use of motor vehicles for people travelling relatively short distances to employment sites, it is critical that this footway is available to encourage workers to walk or cycle to work.

It also offers the shortest route to commuters in the Frenze Hall Lane area of Diss wishing to make use of the railway station.

This appears contrary to national policy on sustainable transport in the NPPF. This requires that, "opportunities to promote walking, cycling and public transport use are identified and pursued and that appropriate opportunities to promote sustainable transport modes can be taken up". The need for the footway has been clearly identified but is not being pursued, or the opportunity taken up, in Policy GNLP0102. The omission of the footway described above fails to take advantage of, "opportunities to maximise sustainable transport solutions" and fails to meet the NPPF requirements to provide for high quality walking and cycling networks and give priority to pedestrian movements both within a development site and with its neighbouring areas.

Diss Town Council believes that, in the absence of a requirement to provide for the footway described above, Policy GNLP0102 is unsound because it does not enable the delivery of sustainable development in accordance with the policies in the NPPF.

#### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Appendices - <https://oc2connect.gnlp.org.uk/a/496>

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**23656****Object**

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**Aylsham, 353**

**Respondent:** Mr francis dodd [19811]

**Summary:**

the current water supply and sewage treatment at Aylsham is a known problem.

**Change suggested by respondent:**

The water supply and sewage treatment should be expanded to allow for future growth to ensure that it is in place before any development takes place.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

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**23654****Object**

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**Aylsham, 350**

**Respondent:** Mr francis dodd [19811]

**Summary:**

there may be good transport links to the town for cars and bus when viewed on paper but the current town centre struggles to cope with larger vehicles' due to the narrow streets. a cursory walk or drive along these routes would have shown this.

**Change suggested by respondent:**

there should be an actual on site visit to ascertain what the transport access is actually like on the ground, specifically bure road/ white hart lane/red lion street

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23655

Object

**Aylsham, 352****Respondent:** Mr francis dodd [19811]**Summary:**

the siting of a primary school near to a major road (A140) and a central route for cars accessing a petrol garage shows a lack of engagement with the local council who could have easily pointed out the folly of this.

**Change suggested by respondent:**

any school should be sited to discourage the use of vehicles and should definitely not be near to any major road or any roads that access the same.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24062

Object

**Policy HEL4/1019, HEL4/1019 Policy****Respondent:** Drayton Farms Ltd [11390]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

The allocation of site GNLP1019 as recreational open space has not been justified with any relevant, up to date or proportionate evidence. The lack of justification is contrary to paragraph 35 of the NPPF.

See attached representation document.

**Change suggested by respondent:**

The plan should be modified by deleting allocation GNLP1019.

We also recommend that further consideration is given to the allocation of sites GNLP0332R and GNLP0334R for residential led development together with the extensive areas of recreational open space indicated in the landowner's Illustrative Framework submitted with seperate representations in relation to GNLP0332R and GNLP0334R.

See attached representation document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP1019 Submission - <https://oc2connect.gnlp.org.uk/a/489>

23723

Object

**Policy 5 Homes, 271****Respondent:** Mr Andrew Driver [17078]**Summary:**

The plan needs to do more to ensure that the right type of housing is built in future. Given that private developers consistently and continually renege on their requirements to provide social and affordable housing as part of their developments, the plan should be proactive in preventing this in the future. The local authorities should take responsibility for building social housing for rent and also not allow private developers to cut numbers of social and affordable housing. Developers must be held to deliver on plans that are submitted with no reduction in social housing after approval by the planning authority.

**Change suggested by respondent:**

See statement above

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23724

Object

**Housing Growth Needs, 179****Respondent:** Mr Andrew Driver [17078]**Summary:**

Whilst much of the GNLP is welcome, there are some significant proposals that appear both damaging and unnecessary. The current level of proposed housing in the plan does not comply with the requirement for a "buffer" of 5%. The far higher figures included in the plan are likely to be unnecessary and therefore the plan should be revised to a level of 42,500. With the existing commitments, windfall developments and the use of the brownfield sites in and around Norwich, the housing needs for the area should be met.

**Change suggested by respondent:**

See statement above

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23725

Object

**Housing Growth Needs, 180****Respondent:** Mr Andrew Driver [17078]**Summary:**

The further 1200 houses, regrettably not clearly explained in this plan, for South Norfolk do not seem to be necessary to meet housing need. These houses will result in taking up greenfield sites or valuable farming land both of which are damaging to the economy and the environment. It would be more sensible not to allocate these potential developments as any identified will result in planning blight and harm to community wellbeing. The poor public transport and other services and facilities in South Norfolk villages means any major increase in population will put too much strain on already overburdened services.

**Change suggested by respondent:**

See statement above

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23726

Object

**Addressing Climate Change, 157****Respondent:** Mr Andrew Driver [17078]**Summary:**

The GNLP is an opportunity to ensure that all new developments are totally environmentally sustainable. Currently the plan does not adequately meet the requirements for carbon neutrality. As a minimum the plan should require all developers to ensure that all houses built should be insulated to the highest possible standards, to all include solar panels for electricity generation and hot water heating, environmentally sustainable heating and grey water capture. The current wording of the plan does not make this clear enough and this is a major missed opportunity to be ambitious, innovative and trail blazing.

**Change suggested by respondent:**

See statement above and we owe it to our children and grandchildren to take necessary steps now to prevent an ecological disaster.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23236

Object

**Policy 0264, 0264 Policy****Respondent:** Miss Sarah Dugdell [19221]**Summary:**

GNLP0264 should not, in my opinion be developed for housing. The flooding that Horsford has seen recently needs to be addressed. Already houses have been built on an inappropriate area near by. The junction at Horseback Way already sees a high volume of traffic at peak times. We do not need to add to this as the B1149 already struggles.

**Change suggested by respondent:**

Given the environmental crisis we (the world) is in we need to act fast. Give this land "back" to the countryside and develop it with a thriving ecosystem in mind. 4 Of the 9 environmental barriers have already been breached.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23944

Object

**Site Assessment Booklets and Studies, Village Clusters – Broadland Assessment Booklets****Respondent:** Paul Dunthorne [20042]**Agent:** One Planning (Heather Byrne, Senior Planning Consultant) [19641]**Petition:** 2 petitioners**Summary:**

Reedham forms a village cluster in the emerging Greater Norwich Local Plan (GNLP) and it is considered that a development of around 50-60 dwellings would be considered suitable for Reedham. As outlined within the Reedham Booklet, services in Reedham include a primary school, village hall, food shop, public house and train station. Two sites are being considered for residential allocation within Reedham and as outlined within our previous representation during the Regulation

18 Stage C Consultation, we consider there are significant constraints with at least one of the sites (in particular GNLP3003) and this is acknowledged within the allocations as it states both sites have highway issues that may need further investigation and therefore it is considered these sites should be considered unacceptable and unfavourable for allocation as outlined in the attachment.

Our client's site, site reference GNLP4025, which was put forward as a new site to be considered for residential allocation during the previous Regulation 18 Stage C consultation, would represent a viable and indeed preferable alternative to that proposed allocation for the reasons highlighted below and additional supporting evidence submitted as part of this consultation. Indeed, our client owns a much larger parcel of land than put forward thus far for allocation and could be enlarged to meet the shortfall in housing provision for the village accordingly.

Please see attached Statement.

**Change suggested by respondent:**

We have outlined a number of significant constraints with the proposed allocations, in particular site reference GNLP3003, and serious highway concerns have been raised and the Highways Authority have objected to residential development on this site. It has still not been demonstrated that acceptable visibility splays and two-way access can be provided to ensure safe highway access to the proposed development. Our client considers these concerns critical as providing safe access that would not significantly impact on highway safety is a key consideration reinforced in the NPPF. As it currently stands, this cannot be demonstrated therefore the allocation should be considered unacceptable and unfavourable.

For the reasons highlighted within question 5 it is considered our client's site is suitable, available for development now and achievable. Therefore, the proposed residential allocation would represent a viable and indeed preferable alternative to the proposed allocations for the reasons highlighted above and additional supporting evidence submitted as part of this consultation. The proposed allocation of this site for residential development would ensure the soundness of the GNLP and would make a valuable contribution to the housing need in Reedham.

Please see attached Statement.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** GNLP4025 Representation - <https://oc2connect.gnlp.org.uk/a/477>

Church Road - Reedham Highways - <https://oc2connect.gnlp.org.uk/a/478>

Constraints Plan - <https://oc2connect.gnlp.org.uk/a/479>

Constraints Plan 2 - <https://oc2connect.gnlp.org.uk/a/47v>

Proposed GA - <https://oc2connect.gnlp.org.uk/a/47b>

Home to School and College Transport Policy - Appendix 2 - <https://oc2connect.gnlp.org.uk/a/47c>

## 23945

## Object

### Site Assessment Booklets and Studies, Appendix B – Tables of Unallocated Sites with reasons for rejection

**Respondent:** Paul Dunthorne [20042]

**Agent:** One Planning (Heather Byrne, Senior Planning Consultant) [19641]

**Petition:** 2 petitioners

**Summary:**

Reedham forms a village cluster in the emerging Greater Norwich Local Plan (GNLP) and it is considered that a development of around 50-60 dwellings would be considered suitable for Reedham. As outlined within the Reedham Booklet, services in Reedham include a primary school, village hall, food shop, public house and train station. Two sites are being considered for residential allocation within Reedham and as outlined within our previous representation during the Regulation

18 Stage C Consultation, we consider there are significant constraints with at least one of the sites (in particular GNLP3003) and this is acknowledged within the allocations as it states both sites have highway issues that may need further investigation and therefore it is considered these sites should be considered unacceptable and unfavourable for allocation as outlined in the attachment.

Our client's site, site reference GNLP4025, which was put forward as a new site to be considered for residential allocation during the previous Regulation 18 Stage C consultation, would represent a viable and indeed preferable alternative to that proposed allocation for the reasons highlighted below and additional supporting evidence submitted as part of this consultation. Indeed, our client owns a much larger parcel of land than put forward thus far for allocation and could be enlarged to meet the shortfall in housing provision for the village accordingly

Please see attached Statement

**Change suggested by respondent:**

We have outlined a number of significant constraints with the proposed allocations, in particular site reference GNLP3003, and serious highway concerns have been raised and the Highways Authority have objected to residential development on this site. It has still not been demonstrated that acceptable visibility splays and two-way access can be provided to ensure safe highway access to the proposed development. Our client considers these concerns critical as providing safe access that would not significantly impact on highway safety is a key consideration reinforced in the NPPF. As it currently stands, this cannot be demonstrated therefore the allocation should be considered unacceptable and unfavourable.

For the reasons highlighted within question 5 it is considered our client's site is suitable, available for development now and achievable. Therefore, the proposed residential allocation would represent a viable and indeed preferable alternative to the proposed allocations for the reasons highlighted above and additional supporting evidence submitted as part of this consultation. The proposed allocation of this site for residential development would ensure the soundness of the GNLP and would make a valuable contribution to the housing need in Reedham.

Please see attached Statement

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLP4025 Representation - <https://oc2connect.gnlp.org.uk/a/477>

Church Road - Reedham Highways - <https://oc2connect.gnlp.org.uk/a/478>

Constraints Plan - <https://oc2connect.gnlp.org.uk/a/479>

Constraints Plan 2 - <https://oc2connect.gnlp.org.uk/a/47v>

Proposed GA - <https://oc2connect.gnlp.org.uk/a/47b>

Home to School and College Transport Policy - Appendix 2 - <https://oc2connect.gnlp.org.uk/a/47c>



23712

Object

**Hethel, Settlement Map****Respondent:** Neil Dyer [19941]**Summary:**

The Development boundary stated for the area at Hethel hasn't kept pace with recent developments and is now out of date.

The settlement boundary shouldn't just be a theoretical line, but should reflect actual development that has taken place in the last 10 years.

**Change suggested by respondent:**

Suggested revision to settlement boundary at the earliest available opportunity should follow the ditch line of the Hethel woodland to include existing Classic Team Lotus building built in 2017, existing Turing Park Industrial Estate, planning granted in 2011 and built in 2017 (GNLP2097) and Turing Park Phase 2 (GNLP2109)

Please see attached plan

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Plan - <https://oc2connect.gnlp.org.uk/a/46r>

23777

Support

**The Natural Environment, 109****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

We are pleased that this paragraph now mentions protecting Water Quality in SACs and habitats sites.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23785

Support

**Addressing Climate Change, Climate Change Statement****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

The climate change table (5) looks is a good improvement to the plan and we fully support this.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23788

Support

**Policy 0409AR and BR, Policy 0409AR****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

GNLP0409R

The text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23789

Support

**Policy 0068, Policy 0068****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

The text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23790

Support

**Policy 0133E, Policy 0133E****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

We fully support this allocation as it requires the development to be sited in Flood Zone 1 as we previously requested, and is not allowing less vulnerable in the flood zone as stated in the SFRA.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23791

Support

**Policy 0401, Policy 0401****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

The supporting text includes our previous comments and therefore we are satisfied with this site allocation.

We therefore fully support this allocation.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23776

Support

**Emissions and Climate Change, 97****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

The NPPF 118(b) states that the plan should “recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;”. This paragraph doesn’t specifically state that the carbon balance of developments should be considered but 148 in the plan does say that the plan should “shape places in ways that contribute to radical reductions in greenhouse gas emissions...”.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23778

Support

**The Natural Environment, 112****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

We are finding this paragraph sound but do raise the following comments. This new paragraph has removed mention of natural capital as far as we can see. The paragraph does not mention of natural functioning of ecosystems which would be beneficial.

In relation to green infrastructure, there is a Green Infrastructure Plan from 2007 online, but there is also a Green Infrastructure Study (Dec 2020). The latter maps out 'core areas' for grassland, woodland and wetland but there is no explanation what this means.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23779

Support

**The Natural Environment, 115****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

We are finding this paragraph sound but raise the following comments. We are pleased that our previous comments to paragraph 110 at the time have partially addressed this in new paragraph (115). However, it appears that there is some confusion between green infrastructure and natural habitats. NPPF 171 keeps the two concepts separate "take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure." We would reiterate that green infrastructure is not necessarily biodiverse and may not include different habitats (e.g. farmland and playing fields).

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23780

Support

**Water, 120****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

There is no information about WFD and risk to water quality.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Not specified

**Attachments:** None

23781

Support

**Environment, 145****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

This section has not included anything here about rivers and water quality, such as: 'development will ensure that it is carried out in such locations and ways so that rivers and other water protected sites are protected from pollution and ensure water quality does not deteriorate'.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23782

Support

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

We are finding this policy sound but would raise the following comments on green infrastructure:

Green infrastructure is not always bio diverse and the plan has not mapped the habitats (just core areas in the GI study) or linked to the relevant partnerships (174). Green Infrastructure can vary in quality. For example, farming and playing fields would be of lower environmental quality than other forms. The plan should encourage multifunctional bio diverse green infrastructure links.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23783

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

Nothing has been added here in response to our comments referenced in our previous representation and as such they still stand. There is no mention of water quality at all and no acknowledgement of needing to protect it or risks from development. As previously stated, the policy does not reference WFD which is a key piece of legislation supporting and setting specific targets for enhancement and requires amending.

**Change suggested by respondent:**

We would expect the policy to reference WFD as a starting point. It is important to reference water and water quality as this is something that designated sites rely on.

The policy should reference the Water Cycle Study and that development should be located in areas to avoid harm to the natural Environment.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23784

Support

**Water, 258**

**Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]

**Summary:**

Whilst we are not objecting, we do have some concerns that we would like to highlight. The local Plan should really discuss the purpose of the WCS in more detail and make it clear why one has been undertaken. It currently does not do this.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23786

Support

**Wymondham, 4.56**

**Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]

**Summary:**

We are raising a generic comment for all Wymondham site allocations:

The latest version of the Water Cycle Study shows that Wymondham WRC will be over capacity post growth. This needs highlighting here. As stated, the latest findings and recommendations from the WCS should be incorporated and reflected in the Local Plans and Site Allocations.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23787

Support

**Utilities, 0360/3053/R10 Policy****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNLP0360 due to being Flood Zone 3b, and there is no mention on the need to not increase flood risk elsewhere and therefore provide flood storage.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23832

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]**Summary:**

The policy does not refer to water quality or environmental legislation such as WFD.

**Change suggested by respondent:**

The paragraph needs to refer to water quality, environmental legislation such as water quality and revert this back to the potential impacts of developments flows directed to Water Recycling Centres. The policy should refer to the Water Cycle Study that has been submitted in support of this Local Plan.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24294

Support

**Policy 0463R, 0463R Policy****Respondent:** ESCO Developments Ltd [19409]**Agent:** Brown & Co (Mr Paul Clarke, Associate Partner) [12840]

**Summary:****3. Conclusions**

3.1 The GNLP in its current form is considered to be sound as the strategy adequately delivers on the overall purpose of the plan in providing a range, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. We would support the distribution of growth insofar as it seeks to support the Service Villages and sustain them for the foreseeable future and facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft GNLP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, and this is supported.

3.2 The proposed development would make a positive contribution to the provision of market and affordable housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF.

3.3 We consider this form of development that is part of the draft allocation for this village, led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential development can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares. Provision of significant open space on Snow Hill, would create a significant area of green space, something which has become more important than ever in light of the pandemic. The relationship of the site with the existing services and facilities in the area will result in a sustainable form of development that will contribute significant benefits to the area

Please see attachment for full representation

**Change suggested by respondent:**

Please see attachment for full representation

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Regulation 19 representations relating to land at Langley Road, Chedgrave.pdf - <https://oc2connect.gnlp.org.uk/a/4cy>

23910

Object

**Hellesdon, Settlement Map****Respondent:** Eversley Road Norwich Ltd [20039]**Agent:** Walsingham Planning (Mr Jake McLeod, Planning Consultant) [19963]**Petition:** 2 petitioners**Summary:**

Please refer to the accompanying Representations Statement prepared by Walsingham Planning

**Change suggested by respondent:**

Please refer to the accompanying Representations Statement prepared by Walsingham Planning

**Legally compliant:** Yes**Sound:** No**Comply with duty:** Yes**Appear exam:** Appearance at the examination**Attachments:** Full Response - <https://oc2connect.gnlp.org.uk/a/473>

24384

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Executors of JM Crane Will Trust & Trustees of JM Crane Children's 2001 Settlement [20070]**Agent:** Savills (Lydia Voyias, Associate) [16956]**Summary:**

Affordable Housing

Draft Policy 5 states: "Major residential development proposals and purpose-built student accommodation will provide:

- at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28% ..."

This policy wording is not considered to be effective by inclusion of the reference "at least 33% affordable housing".

In addition the policy wording does not appear to be robustly justified by the support evidence base. It is stated at paragraph 271 that the supporting Strategic Housing Market Assessment 2017 identifies a need for 11,030 affordable homes across Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point. In addition it is also stated at paragraph 271 that "The most recent viability study findings... conclude... generally able to provide 28% affordable housing". Whilst it is noted that the Council has updated its Viability Evidence in December 2020 it doesn't appear to relate to Broadland Village Clusters. In addition I am aware that Broadland Council has been seeking 28% affordable housing in recent S106 agreements based upon the relevant evidence base.

NDSS

The Pre-Submission Plan does not adequately demonstrate that a policy requirement for all new housing residential development comply with the Nationally Described Space Standards (NDSS) is 'needed'. The fact that some proposals are already providing development which complies with the relevant standards is not sufficient justification. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:****Affordable Housing**

It is requested the policy is amended to state: "Major residential development proposals will provide 28% affordable housing on-site across the plan area. The Council will negotiate with developers if an accurate viability assessment indicates that this target cannot be met in full."

**NDSS**

Specific reference to compliance with the NDSS should therefore be removed as it is not justified.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** Access Strategy Letter - Richard Jackson.pdf - <https://oc2connect.gnlp.org.uk/a/4wq>  
22 March 2021 Buxton - Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4fr>  
Preliminary Ecological Appraisal - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4fs>  
LVIA-App^02-Figures - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4ft>  
LVIA-Baseline-Issue^ - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4f3>  
LVIA-App^01-Methodology - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4f4>

24385

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Executors of JM Crane Will Trust & Trustees of JM Crane Children's 2001 Settlement [20070]**Agent:** Savills (Lydia Voyias, Associate) [16956]**Summary:**

The proposed policy requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not robustly supported by the Local Plan evidence base. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

The 'Greater Norwich Energy Infrastructure Study' states at para. 5.4.1, that to respond to the aim to 'minimise energy demand of the new development' that: "New residential ... developments need to meet Part L building regulations relevant at the time of construction ..." (emphasis added). As such this is a proposed local policy requirement which needs to be robustly considered in terms of viability implications for all development if it is to be applied. The supporting evidence base does appear to demonstrate this.

**Change suggested by respondent:**

Remove reference to the proposed requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations as it does not appear to be justified by the evidence base.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Access Strategy Letter - Richard Jackson.pdf - <https://oc2connect.gnlp.org.uk/a/4wq>  
 22 March 2021 Buxton - Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4fr>  
 Preliminary Ecological Appraisal - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4fs>  
 LVIA-App^02-Figures - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4ft>  
 LVIA-Baseline-Issue^ - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4f3>  
 LVIA-App^01-Methodology - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4f4>

24383

Support

**Policy 0297, 0297 Policy****Respondent:** Executors of JM Crane Will Trust & Trustees of JM Crane Children's 2001 Settlement [20070]**Agent:** Savills (Lydia Voyias, Associate) [16956]

**Summary:**

Please refer to full representations comprising covering letter and supporting documents. Whilst strong support is given to the draft policy, objection is raised to draft Policy GNLPO297 criteria 6 on the basis that there is ambiguity regarding the justification for its inclusion in respect of this specific site. In addition the wording could be interpreted as seeking to unnecessarily limit the delivery of housing at the site and therefore comment is made about the consistency of the draft policy wording with planning practice guidance.

It is noted that the Statutory Water and Sewerage Undertaker has a statutory duty to make provision for essential water supplies and the collection, treatment and disposal of used water. It is stated in the Greater Norwich Infrastructure Needs Report 2021 that "AW's Water Resources Management Plan does not identify a need for additional water supply infrastructure to serve growth in Greater Norwich to 2038" (para 3.1.2). Notwithstanding this, it is stated at paragraph 6.14 of the Local Plan that "There is not currently enough capacity in Aylsham Water Recycling Centre to accommodate development and no plans to upgrade in terms of flow...".

In respect of Buxton, the Greater Norwich Water Cycle Study identifies that the existing capacity at the Aylsham Water Recycling Centre, as operated by Anglian Water Services, is controlled via permit. It is identified in the report that 'Aylsham WRC's flow permit would be exceeded once all the growth within its catchment is delivered by 2038 and a new permit would be required.' (page 17). However, Table 4-30 of the Greater Norwich Water Cycle Study states 'AWS have confirmed upgrades are planned between 2020 and 2025'. As such it is currently unclear as to whether the flows associated with the proposed allocation have already been taken into consideration as part of the planned upgrades at Aylsham Water Recycling Centre or not. Clarity is sought on this matter as to confirm whether it is necessary for Policy GNLPO297 for include reference to draft policy criteria 6.

**Change suggested by respondent:**

The Greater Norwich Water Study states at Table 4-30, in respect of applications submitted from 2020 onwards, "... developers should contact AWS to confirm flow rates and intended connection points (via a pre-development enquiry) to demonstrate that the WRC can accept the additional flows".

If it is found that the proposed allocation flows are not included within the planned upgrade works, it is suggested that draft Policy 0297 criteria 6 is reworded to state:

"Development proposals at Buxton should have regard to the findings of the Water Cycle Study which indicates potential capacity limitations at the Aylsham Water Recycling Centre'. A Utilities Statement will be required to support the planning application to demonstrate how capacity be made available to serve the site."

It is suggested that this alternative wording better reflects the Planning Practice Guidance contained at paragraph 020 Reference ID: 34-020-20140306 which states "The preparation of plans should be the focus for ensuring that investment plans of water and sewerage companies align with development needs. If there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants can be asked to provide information about how the proposed development will be drained and wastewater dealt with..."

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Access Strategy Letter - Richard Jackson.pdf - <https://oc2connect.gnlp.org.uk/a/4wq22>  
 22 March 2021 Buxton - Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4fr>  
 Preliminary Ecological Appraisal - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4fs>  
 LVIA-App^02-Figures - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4ft>  
 LVIA-Baseline-Issue^ - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4f3>  
 LVIA-App^01-Methodology - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4f4>

24512

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Executors of JM Crane Will Trust & Trustees of JM Crane Children's 2001 Settlement [20070]**Agent:** Savills (Lydia Voyias, Associate) [16956]**Summary:**

Affordable Housing

Draft Policy 5 states: "Major residential development proposals and purpose-built student accommodation will provide:

- at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28% ..."

This policy wording is not considered to be effective by inclusion of the reference "at least 33% affordable housing".

In addition the policy wording does not appear to be robustly justified by the support evidence base. It is stated at paragraph 271 that the supporting Strategic Housing Market Assessment 2017 identifies a need for 11,030 affordable homes across Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point. In addition it is also stated at paragraph 271 that "The most recent viability study findings... conclude... generally able to provide 28% affordable housing". Whilst it is noted that the Council has updated its Viability Evidence in December 2020 it doesn't appear to relate to Broadland Village Clusters. In addition I am aware that Broadland Council has been seeking 28% affordable housing in recent S106 agreements based upon the relevant evidence base.

NDSS

The Pre-Submission Plan does not adequately demonstrate that a policy requirement for all new housing residential development comply with the Nationally Described Space Standards (NDSS) is 'needed'. The fact that some proposals are already providing development which complies with the relevant standards is not sufficient justification. As such, the Plan is not justified, will not be effective, and is not consistent with national policy.

**Change suggested by respondent:**

Affordable Housing

It is requested the policy is amended to state: "Major residential development proposals will provide 28% affordable housing on-site across the plan area. The Council will negotiate with developers if an accurate viability assessment indicates that this target cannot be met in full."

NDSS

Specific reference to compliance with the NDSS should therefore be removed as it is not justified.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Written Representation

**Attachments:** 22 March 2021 Buxton - Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4gd>  
 Access Strategy Letter - Richard Jackson.pdf - <https://oc2connect.gnlp.org.uk/a/4gw>  
 Preliminary Ecological Appraisal - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gf>  
 LVIA-App^02-Figures - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gg>  
 LVIA-Baseline-Issue^ - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gh>  
 LVIA-App^01-Methodology - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gx>

24513

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Executors of JM Crane Will Trust & Trustees of JM Crane Children's 2001 Settlement [20070]**Agent:** Savills (Lydia Voyias, Associate) [16956]**Summary:**

The proposed policy requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not robustly supported by the Local Plan evidence base. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.

The 'Greater Norwich Energy Infrastructure Study' states at para. 5.4.1, that to respond to the aim to 'minimise energy demand of the new development' that: "New residential ... developments need to meet Part L building regulations relevant at the time of construction ..." (emphasis added). As such this is a proposed local policy requirement which needs to be robustly considered in terms of viability implications for all development if it is to be applied. The supporting evidence base does appear to demonstrate this.

**Change suggested by respondent:**

Remove reference to the proposed requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations as it does not appear to be justified by the evidence base.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** 22 March 2021 Buxton - Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4gd>  
 Access Strategy Letter - Richard Jackson.pdf - <https://oc2connect.gnlp.org.uk/a/4gw>  
 Preliminary Ecological Appraisal - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gf>  
 LVIA-App^02-Figures - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gg>  
 LVIA-Baseline-Issue^ - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gh>  
 LVIA-App^01-Methodology - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gx>

24511

Object

**Policy 0297, 0297 Policy****Respondent:** Executors of JM Crane Will Trust & Trustees of JM Crane Children's 2001 Settlement [20070]**Agent:** Savills (Lydia Voyias, Associate) [16956]



**Summary:**

Please refer to full representations comprising covering letter and supporting documents. Whilst strong support is given to the draft policy, objection is raised to draft Policy GNLP0297 criteria 6 on the basis that there is ambiguity regarding the justification for its inclusion in respect of this specific site. In addition the wording could be interpreted as seeking to unnecessarily limit the delivery of housing at the site and therefore comment is made about the consistency of the draft policy wording with planning practice guidance.

It is noted that the Statutory Water and Sewerage Undertaker has a statutory duty to make provision for essential water supplies and the collection, treatment and disposal of used water. It is stated in the Greater Norwich Infrastructure Needs Report 2021 that "AW's Water Resources Management Plan does not identify a need for additional water supply infrastructure to serve growth in Greater Norwich to 2038" (para 3.1.2). Notwithstanding this, it is stated at paragraph 6.14 of the Local Plan that "There is not currently enough capacity in Aylsham Water Recycling Centre to accommodate development and no plans to upgrade in terms of flow...".

In respect of Buxton, the Greater Norwich Water Cycle Study identifies that the existing capacity at the Aylsham Water Recycling Centre, as operated by Anglian Water Services, is controlled via permit. It is identified in the report that 'Aylsham WRC's flow permit would be exceeded once all the growth within its catchment is delivered by 2038 and a new permit would be required.' (page 17). However, Table 4-30 of the Greater Norwich Water Cycle Study states 'AWS have confirmed upgrades are planned between 2020 and 2025'. As such it is currently unclear as to whether the flows associated with the proposed allocation have already been taken into consideration as part of the planned upgrades at Aylsham Water Recycling Centre or not. Clarity is sought on this matter as to confirm whether it is necessary for Policy GNLP0297 for include reference to draft policy criteria 6.

**Change suggested by respondent:**

The Greater Norwich Water Study states at Table 4-30, in respect of applications submitted from 2020 onwards, "... developers should contact AWS to confirm flow rates and intended connection points (via a pre-development enquiry) to demonstrate that the WRC can accept the additional flows".

If it is found that the proposed allocation flows are not included within the planned upgrade works, it is suggested that draft Policy0297 criteria 6 is reworded to state:

"Development proposals at Buxton should have regard to the findings of the Water Cycle Study which indicates potential capacity limitations at the Aylsham Water Recycling Centre'. A Utilities Statement will be required to support the planning application to demonstrate how capacity be made available to serve the site."

It is suggested that this alternative wording better reflects the Planning Practice Guidance contained at paragraph 020 Reference ID: 34-020-20140306 which states "The preparation of plans should be the focus for ensuring that investment plans of water and sewerage companies align with development needs. If there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants can be asked to provide information about how the proposed development will be drained and wastewater dealt with..."

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 22 March 2021 Buxton - Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4gd>  
 Access Strategy Letter - Richard Jackson.pdf - <https://oc2connect.gnlp.org.uk/a/4gw>  
 Preliminary Ecological Appraisal - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gf>  
 LVIA-App^02-Figures - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gg>  
 LVIA-Baseline-Issue^ - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gh>  
 LVIA-App^01-Methodology - TLP.pdf - <https://oc2connect.gnlp.org.uk/a/4gx>

24300

Object

**Economy, 127****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:**

FCC supports the statement in paragraph 127 of the Pre-Submission Draft Strategy that “Generating the right levels of growth in the right places will help our local economy by stimulating economic investment, new infrastructure, new technologies and environmental improvements. This will improve access across Greater Norwich to services and jobs, and lead to better environmental quality”. The vision states that most job growth is expected to be delivered on key strategic sites in and around Norwich. Paragraph 131 goes onto state that “the role of smaller scale employment sites elsewhere in the urban area, market towns and villages will help to deliver good access to jobs for all”. However, it is noted that there is no reference in the vision, or policies, to the rural economy outside settlement boundaries and within the countryside. FCC consider this not to be consistent with the NPPF and the Local Plan needs to consider the vitality and economy of rural areas needed for rural communities to boost rural economic growth. The Vision should be strengthened to include the importance of the rural economy within the countryside.

**Change suggested by respondent:**

See attached letter

**Legally compliant:** Yes**Sound:** No**Comply with duty:** Yes**Appear exam:** Appearance at the examination**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24301

Object

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**Addressing Climate Change, Climate Change Statement****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:**

The Climate Change Statement presented on page 42 sets out how the GNLP will address climate change. One of the measures presented is requiring the location and design of development to ... reduce the need to travel, particularly by private car. The great majority of development allocations is in urban areas and large villages. The statement states that growth in villages is located where there is good access to services to support their retention. The distribution of the great majority of growth thus reduces the need to travel. Although FCC supports this in principle, it is considered that the GNLP should be flexible and consider certain developments which require to be located in rural locations away from urban areas or development in rural locations where communities are dependent on the private car. Such proposals can incorporate sustainable initiatives and consider climate change impacts within their design.

**Change suggested by respondent:**

See attached lette

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24302

Object

**Delivery, Delivery Statement****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:****Delivery Statement**

The Delivery Statement presented on page 40 of the Pre-Submission Draft Strategy is not a policy but does set out how the GNLP addresses two key issues; the delivery of growth and addressing climate change. Regarding economic development, the Delivery Statement states that the plan provides choice and flexibility with a wide range of type and sizes of employment sites. FCC supports the inclusion of the following statement that “smaller scale and rural employment sites are less likely to be constrained by infrastructure requirements and will be supported in accessible and sustainable locations”. However, it is considered that the plan doesn’t go far enough in supporting the rural economy with no reference to employment development within the countryside where a rural location outside settlement boundaries can be justified. This is explored further within comments on Policies 1, 6 and 7.4 below.

**Change suggested by respondent:**

See attached letter

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24303

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners

**Summary:****Policy 1 The Sustainable Growth Strategy**

Policy 1 sets out the broad strategic approach for growth. FCC supports paragraph 15 of the Pre-Submission Draft Strategy that "our ambitions for delivering sustainable growth through the GNLP must reflect the Government's requirements for local plans set out in the NPPF". The settlement hierarchy presented in policy 1 includes village clusters which covers all other settlement areas outside the key service centres. FCC consider that the countryside should be identified on the settlement hierarchy enabling the growth of the rural economy.

It is noted that paragraph 169 of the Pre-Submission Draft Strategy states that the total amount of allocated and permitted employment land in 2018 is more than enough to provide for expected and promoted growth. Therefore, it is understood that a large number of employment allocations have been brought forward from current adopted plans and that the GNLP does not make significant additional allocations of employment land beyond those already identified. A detailed review of the employment figures and allocations has not been undertaken; however, FCC consider that the reassessment of all undeveloped allocated sites should be undertaken to determine whether they are likely to be developed by the end of the GNLP period. If a site is no longer considered to be deliverable, it should be de-allocated and replaced by an alternative allocation. Policies also need to remain flexible enough for any new sites to be considered acceptable over and above allocated sites.

Paragraph 161 of the Pre-Submission Draft Strategy states that the GNLP takes a flexible approach. FCC consider that the plan could go further with the need for some flexibility to be contained within spatial employment growth to reflect changes in the demand for land. This is in line with paragraph 120 of the NPPF which states that "planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans and of land availability...".

Policy 1 states that smaller scale employment sites are allocated, and additional windfall sites will be provided in urban areas, towns and large villages providing local job opportunities and a vibrant rural economy. FCC consider that to be consistent with the NPPF, the GNLP needs to go further in supporting development in the countryside where there is a justified locational need. Paragraph 82 of the NPPF states that "planning policies and decisions should recognise and address the specific locational requirements of different sectors". The policy should be amended to provide greater flexibility in relation to rural areas, not limiting development to within village settlements if that development can demonstrate that it would enhance the vitality and viability of the local community and services; the policy should enable the impacts of such a scheme to be weighed against any benefits.

Paragraph 188 of the Pre-Submission Draft Strategy states that the strategy for the location of growth is to maximise brownfield development and regeneration opportunities, which are mainly in Norwich. FCC considers that this should be strengthened to maximise brownfield land within rural areas too. The NPPF encourages the effective use of land by reusing all brownfield land.

**Change suggested by respondent:**

See attached letter

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24304

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:**

Policy 6 The Economy (Including Retail)

Paragraph 285 of the Pre-Submission Draft Strategy Documents states that “this local plan aims to deliver inclusive economic growth ... in a time of significant economic uncertainty and change, the policies aim to provide an appropriate balance between certainty and flexibility to inform investment decisions and encourage economic development”.

FCC supports the following paragraph 70 of the Pre-Submission Draft Strategy Document that “rural enterprises are important to the local economy. The proportion of micro-businesses employing up to nine people is above the national average in Broadland and South Norfolk. Signs are that new and small businesses can flourish and the survival rate of newly established enterprises is good”. Paragraph 71 goes onto state that the GNLP should support the growth of a wide ranging and changing economy, including smaller rural enterprises.

It is noted that Policy 6 does not reference small scale employment development within the countryside, outside settlement boundaries. This is questioned given numerous evidence base documents highlights the importance of the rural economy including the Employment Land Assessment Addendum 2020 which highlights the rural economy as an opportunity to rebalance the local economy internally. This approach differs from the adopted South Norfolk Joint Core Strategy which supports small to medium scale commercial enterprises within the countryside where a rural location can be justified. To exclude land from development purely because it lies outside of a settlement boundary would place unnecessary limits on the most effective use of land and potential delivery of sustainable development. A less restrictive approach, whereby the merits of each case is considered individually, would support greater enhancement of the rural economy. The policy should include the benefits that the scheme would generate for the rural economy to be considered and weighed against any impacts.

Services including petrol filling stations are key infrastructure requirements for economic growth, especially in rural locations where communities are dependent on the private car. The GNLP should be worded in such a manner that further infrastructure requirements in rural areas can be provided for, enabling the rural economy to be boosted.

**Change suggested by respondent:**

See attached letter

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24548

Object

**Environment, 148****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:**

Paragraph 148 of the vision states that “development will make efficient use of brownfield sites and minimise the loss of greenfield land”. FCC considers that this statement should be strengthened to add that development will make efficient use of brownfield sites within both urban and rural areas. The NPPF encourages the effective use of land by reusing all brownfield land

**Change suggested by respondent:**

See attached letter

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24549

Object

**The Plan's Objectives, 151****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:**

Economy Objective

The Plans objective for economy states that “to support and promote clean growth and progress towards a postcarbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of a wider entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce” (page 38). FCC consider that the objective for economy should reference the importance of the rural economy and the support for the vitality of rural communities.

**Change suggested by respondent:**

See attached letter

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>

24550

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** FCC Environment Ltd [15641]**Agent:** Sirius Planning (Miss Francesca Wray, Project Planner) [15640]**Petition:** 2 petitioners**Summary:**

Policy 7.4 Strategy for the Areas of Growth – Village Clusters

Policy 7.4 outlines the strategy for areas of growth within village clusters and highlights that there will be 2.3ha of new employment allocations within this settlement hierarchy tier. The policy states that “other small-scale employment development will be acceptable in principle elsewhere within village development boundaries, through the re-use of rural buildings or through the potential expansion of existing small and medium sized employment sites, subject to meeting other policies in the development plan”.

FCC consider this is overly restrictive and may restrict future economic development in rural areas. For Policy 7.4 to be consistent with national policy, small-scale employment development should also be acceptable in principle within the countryside where a rural location outside settlement boundaries can be justified. For example, refuelling stations having a functional need to be located off strategic roads which are normally outside settlement boundaries, such as FCC’s Pulham Market site proposals. Paragraph 84 states that “planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport...The use of previously developed land...should be encouraged where suitable opportunities exist”.

It is noted that there are no policies within the GNLP for employment development within the countryside, FCC consider a criteria-based policy allowing windfall developments in the countryside should be included within the GNLP which will provide flexibility in relation to varying locational requirements. Given the Greater Norwich area is predominately rural in nature, in particular South Norfolk in which FCC’s Pulham Market landholding is situated, FCC consider that the GNLP should go further with its strategy to strengthen its commitment to boosting the rural economy. The Broadland and South Norfolk Our Plan 2020 – 2024 identifies to grow the economy as an objective including supporting all sizes and types of businesses. It is acknowledged that we are in a period of significant uncertainty and therefore Local Plan Policies need to be flexible to enable change and worded in a positive manner to proactively encourage the rural economy.

**Change suggested by respondent:**

See attached letter

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Greater Norwich Local Plan Regulation 19 Consultation Representations - Pulham Market Final.pdf - <https://oc2connect.gnlp.org.uk/a/4dr>



24148

Object

**Policy REP1, REP1 Policy****Respondent:** Julie Fielder [19979]**Summary:**

There has been inadequate consultation with residents due to the pandemic. There is currently an application for 141 houses (PA 20200847) and an offsite sports hall on unallocated land outside the development area (PA20201183). Had the public known at the time site allocations were originally considered that agreeing to REP1 could lead to planning applications of this scale, there would have been far more robust objections at the time. The site is stated by the current applicants to be unviable for the number of houses, the on-site sports hall and the amount of social housing stipulated in REP1.

The brought forward allocation of REP1 is not justified as the original allocation was not based on proportionate evidence regarding the lack of infrastructure (inadequate sewerage capacity for that number of new homes, minimal public transport and employment opportunities, and poor roads out of the town). The allocation includes one road into the estate, which exits on a narrow, congested road beside the High School. This road already becomes grid-locked every morning and afternoon. All routes from this road are unable to support more traffic. Improvements are required to Broomhill Lane but it is not confirmed whether the land needed to provide the necessary junction splay is available for adoption - this will need to be agreed by the Secretary of State. Roughly a third of the REP1 housing site is currently used as a school playing field which has been opposed by Sport England and also requires approval by the Secretary of State. The location of REP1 is not sustainable due to the infrastructure concerns above, its proximity to an important watermeadow (50m away) and two nearby SSSIs. It is a green field site outside the town development boundary and encroaches into open countryside.

**Change suggested by respondent:**

The Local Plan should be modified by making REP1 null and void and siting housing on brownfield sites closer to public transport and employment, such as Norwich Airport Industrial Estate at Hurricane Way in Hellesdon, where dozens of industrial units are unused and falling into disrepair.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23589

Object

**Aylsham, Settlement Map****Respondent:** Mary Forrest-Hill [19913]**Summary:**

As a resident of Aylsham & surrounding district I would like to object to resolution 19 of the Greater Norwich Local Plan which involves the land behind the Aylsham Lodge.

The residents of Aylsham, local Parish councils and the Town Council have not been consulted.

**Change suggested by respondent:**

As a resident of Aylsham & surrounding district I would like to object to resolution 19 of the Greater Norwich Local Plan which involves the land behind the Aylsham Lodge.

The residents of Aylsham, local Parish councils and the Town Council have not been consulted.

**Legally** No**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** None

23538

Object

**Policy 0605, 6.38****Respondent:** Foulsham Parish Council (Mr Mike Smith, Clerk) [15066]**Summary:**

The Parish Council objects to this proposal. It will increase traffic through Aubrey Rix Close, which has pavement and road on the same level, with no kerbstones and is also narrow. This will bring pedestrians into close proximity with traffic, which poses a safety risk, especially as there are a large number of young children who walk to and from school along this route. The village has no bus service and therefore cars will be essential for all new residents. There are a number of other development proposals for the village which do not pose such a safety risk.

**Change suggested by respondent:**

The Parish Council does not agree that the proposed access to this site is suitable and, for this reason, the site is not suitable for the proposed development. A much more suitable site exists within the village for a similar size of development.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23719

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Foulsham Parish Council (Mr Mike Smith, Clerk) [15066]**Summary:**

The Parish Council has learned that site GNLP0605 contains ancient hedgerows which would require removal to gain access and is concerned that this issue has not been adequately addressed in previous consultation stages. GNLP0605 was considered a preferred site, partly on the basis that site GNLP0275 was unsuitable due to flood risk. However, permission to develop GNLP0275 has recently been granted with a similar allocation which should negate the requirement to develop GNLP0605. It is also noted that the proposed site is outside of the settlement boundary. For these reasons, the Parish Council believes the consultation process to be flawed.

**Change suggested by respondent:**

The Parish Council does not believe that this site is suitable for development for the reasons outlined.

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Written Representation

Attachments: None

23720

Object

**Policy 0605, 0605 Policy****Respondent:** Foulsham Parish Council (Mr Mike Smith, Clerk) [15066]**Summary:**

The Parish Council has learned that site GNLP0605 contains ancient hedgerows which would require removal to gain access and is concerned that this issue has not been adequately addressed in previous consultation stages. GNLP0605 was considered to be a preferred site, partly on the basis that GNLP0275 was unsuitable due to flood risk. However, permission to develop GNLP0275 has recently been granted with a similar allocation which should negate the requirement to develop GNLP0605. It is also noted that the proposed site is outside the settlement boundary. For these reasons, the Parish Council believes the consultation process to be flawed.

**Change suggested by respondent:**

The Parish Council believes that GNLP0605 is unsuitable for development for the reasons outlined.

Legally No  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Written Representation

Attachments: None

23819

Object

**Policy 0605, 0605 Map****Respondent:** Foulsham Parish Council (Mr Mike Smith, Clerk) [15066]**Summary:**

The Parish Council understands that to access site GNLP0605 as proposed would require the removal of ancient hedgerows and is concerned that this issue has not been adequately addressed within the consultation process. It is also noted that the proposed site is outside of the settlement boundary. In addition, the Parish Council does not agree that Aubrey Rix Close offers safe or suitable access to the site. For these reasons, the Parish Council believes the consultation process to be flawed.

**Change suggested by respondent:**

The plan needs to properly appraise the points made above.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23820

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Foulsham Parish Council (Mr Mike Smith, Clerk) [15066]**Summary:**

The Parish Council understands that GNLP0605 was considered a preferred site, partly on the basis that site GNLP0275 was unsuitable due to being a flood risk. However, permission to develop GNLP0275 has recently been granted with a similar allocation which should negate the requirement to develop GNLP0605. The plan needs to be revised following approval to build on GNLP0275. It is also noted that the proposed site is outside of the settlement boundary. For these reasons, the Parish Council believes the consultation process to be flawed.

**Change suggested by respondent:**

The plan needs to be revised following approval to build on GNLP0275.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23465

Support

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**Freethorpe, Halvergate and Wickhampton, Settlement Map****Respondent:** Freethorpe Parish Council (Mr Andrew Moll, Clerk) [14266]**Summary:**

This representation is on behalf of Freethorpe Parish Council. The Parish Council discussed the current consultation at its meeting on 15th February 2021 and agreed a response that the process has been sound.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Not specified

**Attachments:** None

24129

Support

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**Policy 0102, 0102 Policy****Respondent:** Frontier Agriculture Ltd [20036]**Agent:** Savills (UK) Ltd (Mr Alistair Ingram, Associate Director) [19686]**Petition:** 2 petitioners

**Summary:**

The Site is proposed to be allocated for residential development in the emerging GNLP, under Site Specific Policy GNLP0102 ('the Policy'). This identifies the Site as being suitable for approximately 150 homes.

Our client fully supports the inclusion of the Site within the GNLP and the principle of its allocation for residential redevelopment. The redevelopment of the Site can help to meet strategic objectives in terms of the overall provision of new dwellings within the GNLP area as set out in Policy 1 (The Sustainable Growth Strategy) and Policy 7.2 (The Main Towns). It also reflects its sustainable location, accessibility and deliverability within the emerging Plan period.

Our client welcomes the flexibility in relation to the total number of homes that the Site could deliver, as provided by the Policy. This is reiterated at paragraph 4.23 of the Plan, which sets out an indicative capacity of approximately 150 homes, but recognises that the exact figure will be subject to detailed design and viability considerations. This position provides appropriate flexibility to ensure that the most appropriate scheme for the Site can come forward, whether this is for a higher or lower quantum of dwellings. It in turn ensures that any future scheme will make the most appropriate and efficient use of this brownfield site, taking into account design and viability.

The Policy then sets out a range of specific matters to be addressed through any future development scheme. In particular, none of these represent a constraint on the future delivery of the Site and would be addressed as part of a future planning application. This includes an assessment of contamination, noise / amenity, surface water flood risk and archaeology, and a planning application would incorporate details of appropriate mitigation in relation to these matters, where necessary.

The Policy also requires the widening of Sandy Lane and the provision of a cycle / footway, both for the extent of the site frontage. These can be achieved and the latter in particular will provide for appropriate pedestrian / cycle facilities to be provided on the frontage of the Site, which in turn will link with the wider existing network and ensure that facilities in Diss can be easily accessed.

Finally, the Policy now removes the previous requirement within the Regulation 18 Consultation undertaken in 2020, to provide a footway north to Frenze Hall Lane. Its removal is supported by our client and is entirely justified as there are existing, alternative routes that are a shorter distance and would provide appropriate pedestrian access to the key facilities in Diss. To support this position, we enclose a Pedestrian Accessibility Review prepared by Vectos transport consultants, which includes a comparison of distances and walking times of existing alternative routes, with a route via Frenze Hall Lane. This provides the appropriate evidence to support the position that such a footway would not be justified and therefore does not need to be included as part of the site specific policy in order for the plan to be found 'sound'. Any detailed highways and accessibility requirements can be addressed as part of a future planning application.

See attachment

**Change suggested by respondent:**

Please see enclosed letter for details of representations.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/49q>  
Accessibility Review Final 100321.pdf - <https://oc2connect.gnlp.org.uk/a/4vr>

24130

Support

**Policy 5 Homes, Policy 5 Homes****Respondent:** Frontier Agriculture Ltd [20036]**Agent:** Savills (UK) Ltd (Mr Alistair Ingram, Associate Director) [19686]**Petition:** 2 petitioners**Summary:**

Our client supports Policy 5, insofar as it relates to the provision of affordable housing. This requires provision of 33% affordable housing unless where, for brownfield sites, particular circumstances justify the need for a viability assessment at decision making stage.

This would allow for an appropriate level of affordable housing to be determined during the planning application process, subject to appropriate evidence by way of a viability assessment. This will ensure that, where viable, sites can still provide an appropriate level of affordable housing and in turn contribute to the overall delivery of new homes, which might not otherwise be the case without such an approach.

See attachment

**Change suggested by respondent:**

Please see enclosed letter for details of representations.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/49q>  
Accessibility Review Final 100321.pdf - <https://oc2connect.gnlp.org.uk/a/4vr>

24353

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Fuel Properties Ltd [19392]**Agent:** Icen Projects Ltd (Mr James Waterhouse) [20001]**Summary:**

Policy 1 – The Sustainable Growth Strategy

2.1 We broadly support the overall quantum of development being planned for between 2018 and 2038, with the anticipated delivery of 49,492 new homes providing a reasonable buffer above the identified need of 40,550 homes.

2.2 We would however recommend that the policy clearly identifies the housing requirement against which delivery will be measured. Whilst the policy text identifies the housing need and the number of homes planned for, it is not clear what the housing requirement will be for the Plan period. Therefore we consider that Policy 1 should be amended to include explicit reference to the housing requirement, both for the 20 year Plan period as a whole and on an annualised basis.

2.3 In terms of the growth strategy identified in the policy, we support the intention to focus growth in the most sustainable locations, and particularly in the Norwich urban area. The redevelopment of the former Carrow Works site has the potential to deliver some 2,000 new homes towards the identified housing need for Greater Norwich, as well as employment space accommodating approximately 1,500 jobs, in a sustainable location to the southeast of the City Centre.

See attachment for full representation.

**Change suggested by respondent:**

See attachment.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 210319 Fuel Properties\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4w9>



24355

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Fuel Properties Ltd [19392]

**Agent:** Icen Projects Ltd (Mr James Waterhouse) [20001]

### Summary:

Policy 7 – Strategy for the Areas of Growth

2.15 We strongly support the identification of East Norwich as a key opportunity to create a new sustainable urban quarter for Norwich, which will act as a catalyst for additional regeneration in neighbouring urban areas and contribute significantly towards the growth of the Greater Norwich economy. Carrow Works forms an important element of the wider site allocation. The landowners and other partners in the East Norwich Partnership are progressing the area-wide masterplanning exercise to address the key planning issues and coordinate growth across the different sites.

2.16 In terms of the specific policy wording, we recommend it is clarified in the policy text that the figures provided in the table identifying the number of new homes and jobs allocated for each site are approximate. This is confirmed in the East Norwich section of the policy, which indicates that the area is allocated for “in the region of” 4,000 additional homes and “around” 6,000 jobs, however for clarity we consider that the table above should also indicate that the figures identified are approximate, and subject to further masterplanning work and assessment. This flexibility is important to ensure

development makes efficient use of this sustainable site, and is not unduly constrained by the figures identified at this stage.

Please see attachment for full representation

### Change suggested by respondent:

Please see attachment for full representation

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** 210319 Fuel Properties\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4w9>

24354

Object

## Policy 2 Sustainable Communities, Policy 2 Sustainable Communities

**Respondent:** Fuel Properties Ltd [19392]

**Agent:** Icen Projects Ltd (Mr James Waterhouse) [20001]

**Summary:****Policy 2 – Sustainable Communities**

2.4 We support the aim of Policy 2 to promote sustainable communities and to ensure development is of a high quality and mitigates and adapts to climate change.

2.5 However, we are concerned that the current wording at Point 9 of the Policy is not sufficiently clear and would create uncertainty for developers and decision makers. In relation to water management and efficiency, the draft policy currently indicates that “if the potential to set more demanding standards [above Building Regulations Part G and BREEAM Very Good] locally is established by the Government, the highest potential standard will be applied in Greater Norwich.

2.6 In our view, the above wording does not provide sufficient certainty as to how development proposals should be assessed, as required by paragraph 16(d) of the NPPF, as it is currently unknown what future standards might be identified by Government. This would also generate significant uncertainty regarding the deliverability of development in Greater Norwich given any as-yet undefined future standards cannot be factored into the overall viability assessment supporting the Plan. As such, it is impossible to establish whether the requirement to meet any future standards would be viable or place an undue burden on developers in the local context and thus pose a risk to the delivery of development.

2.7 In order to ensure the soundness of the policy, we therefore recommend that this sentence is deleted.

In our view, any future standards that might be introduced by Government should be dealt with as part of a review of the Local Plan, when the relevant detail is available.

2.8 Furthermore, it is unclear how part iii of the policy relates to the requirements set out at Points 1-10 above. Given the second part of the policy (i-iv) seeks to set out measures to assist the approach identified in 1-10, the reference to delivery timescales does not directly relate to the requirements above which deal with sustainable and high quality development. We therefore recommend that this element be removed from the policy and dealt with elsewhere in the Plan if considered necessary. In terms of the general intention to ensure prompt delivery of a scheme, we support the broad intention to ensure developments progress in a timely manner, however we would emphasise the need for flexibility within delivery plans to acknowledge various risks and factors that may delay the delivery of a site beyond the control of a developer, and that there should be appropriate acknowledgement that any such plans are illustrative. This would not affect the Local Authority’s legal powers including compulsory purchase.

See attachment for full representation

**Change suggested by respondent:**

See attachment for full representation

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 210319 Fuel Properties\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4w9>

24356

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Fuel Properties Ltd [19392]**Agent:** Icen Projects Ltd (Mr James Waterhouse) [20001]**Summary:**

Policy 5 – Homes

2.13 We support the recognition within Policy 5 that brownfield sites are subject to particular costs and constraints and thus may not be able to provide the full portion of affordable housing generally expected by policy. In particular the cost of remediating contamination, delivering infrastructure and working with constraints such as heritage assets will need to be carefully assessed in relation to key regeneration opportunities such as the former Carrow Works site, with due consideration given to the level of affordable housing it would be viable to deliver whilst achieving the various other aims and policy requirements for the site. It is anticipated that further details on such matters will be provided through the masterplanning exercise currently being progressed for East Norwich Strategic Regeneration Area.

2.14 In relation to specialist accommodation, the former Carrow Works site has the potential to include an element of accommodation for older people, and the text of Policy 5 would support this provision. We would also recommend that other types of specialist accommodation are addressed in the policy, in particular purpose-built accommodation for rent (Build-to-Rent/ PRS). The 2017 SHMA indicates that the rate of increase of PRS has been significant in recent years, with 45% growth in Central Norfolk between 2001 and 2011. Accordingly, inclusion of reference to supporting the delivery of PRS/ Buildto-Rent development in Policy 5 would ensure sufficient provision is made for different elements of housing need within the market.

See attachment for full representation

**Change suggested by respondent:**

See attachment for full representation

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 210319 Fuel Properties\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4w9>

24551

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Fuel Properties Ltd [19392]**Agent:** Icen Projects Ltd (Mr James Waterhouse) [20001]

**Summary:****Policy 3 – Environmental Protection and Enhancement**

2.9 We support the aim of the policy to ensure development appropriately protects and has regard to both the historic and natural environment. The former Carrow Works site contains a number of heritage assets and is also within the setting of various other assets, and there is a significant opportunity to conserve and enhance these assets through an appropriately sympathetic redevelopment proposal.

2.10 In order to ensure the text of Policy 3 is compliant with national policy, we consider that the second bullet point under the historic environment section of the policy needs to be updated, to fully reflect the approach set out at paragraphs 193-197 of the NPPF. The current wording refers to all designated and non-designated heritage assets as a single group and indicates that harm should be avoided “unless there are overriding benefits”. We consider that this does not sufficiently reflect the approach advocated by the NPPF, which requires different levels of benefits and justification depending on the significance of the asset and the extent of harm generated. On the one hand, substantial harm or loss of the most significant assets should be wholly exceptional, whilst at the other end of the scale paragraph 197 of the NPPF indicates that the effect of development on the significance of a nondesignated heritage asset should be “taken into account”, with a “balanced judgement” being made having regard to the scale of any harm or loss and the significance of the asset. We are concerned that the current policy wording suggests a need for “overriding benefits” regardless of the significance of an asset or the extent of harm, which would not be consistent with national policy. It is also unclear how “historic character” is defined and how this reference in the policy relates to terms used in the NPPF.5

2.11 In a similar way, we also recommend that the wording of the policy in relation to the natural environment is clarified. The reference to avoiding harm to all designated and non-designated natural assets unless there are “overriding benefits” conflicts with the indication later in the policy that regard will be given to the level of importance of the natural element. In order to ensure the policy is sound, we therefore recommend that this wording is clarified, with appropriate references to Chapter 15 of the NPPF.

2.12 In relation to the references to biodiversity net gain, it will be necessary to ensure that the final policy wording reflects the requirements set out in the Environment Act once this is enacted.

See attachment for full representation

**Change suggested by respondent:**

See attachment for full representation

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** 210319 Fuel Properties\_FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4w9>

24205

Object

**How the GNLP fits in with other Planning bodies and strategies, 18****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

BDC is interested in how the GNLP considered Breckland's growth as identified in Breckland's adopted 2019 Local Plan?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24206

Object

**The GNLP and other local plan documents, 32****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Breckland District Council is interested in the location of these additional 1200 homes, and whether they too will be allocated between A47 and A11. An additional 1200 homes, along with existing allocations at Easton and Wymondham plus Breckland's growth plans will put further pressure on infrastructure of power and water

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24207

Object

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**The economy, 64**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

BDC is interested in the synergies considered in the Economic growth aspirations of GNLP with those employment sites and strategies in Breckland which are also along A11 and A47

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24208

Object

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**Digital Infrastructure, 92**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Is this roll out to rural areas as well?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24209

Object

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**Economy, 128**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Have any synergies been considered with Snetterton Heath business park with businesses in green energy technology, transport & warehousing, digital industries?

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: No

Comply with No

duty:

Appear exam: Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24210

Object

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**Homes, 135**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Breckland is also concentrating its housing in this area.

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: No

Comply with No

duty:

Appear exam: Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24211

Object

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**Infrastructure, 141**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

How far has this vision been scoped out with neighbouring local authorities?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24212

Object

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**Delivery, 153**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

What joined up measures were considered with those district councils on its borders where the intended growth is to occur?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>



24213

Object

**Delivery, 155**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Where will this additional 22% be allocated within the local plan?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24214

Object

**The Key Diagram, Map 7 Housing Growth Locations**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

These following sites have been highlighted but not allocated, are these sites the ones proposed in Policy 7.6 e.g.

GMLP0415/DR at Honingham (Honingham new settlement)

GMLP4057A, GMLP1055R, GMLP4057C along A11 at Wymondham, Hethel, Spooner Row

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24215

Object

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**Introduction, 165**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

We note these proposals are close to Breckland borders and have concerns over the impact on infrastructure and nearby communities and would welcome early discussions if and when these progress

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24216

Object

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**Employment Growth Needs, 170**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Breckland also has substantial employment land allocated in this area and have concerns on the impact of cumulative growth on infrastructure

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24217

Object

**Housing Growth Needs, Table 6 Establishing the Plan's total housing potential figure****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

What modelling has been done of the cumulative growth aspirations of both Breckland and GNLP to support 22% additional growth

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24218

Object

**Housing Growth Needs, 180****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

This has not been submitted with the GNLP but Breckland would like clarification on where the focus of this growth would be. Cumulative growth along the A11 and A47 would put further pressures on infrastructure.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24219

Object

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**Housing Growth Needs, 187**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Breckland has concerns over the location and size of this growth which is close to its borders and would impact on its own growth plans in the area and would welcome further information on the progress on these settlements

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24220

Object

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**The Growth Strategy, 188**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

c.  
Further focus on growth area which is also growth area for Breckland

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24221

Object

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**The Strategic Growth Area, 193**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Breckland seeks confirmation that the proposed growth from GNLP will not be at the detriment to the growth planned within Breckland.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24222

Object

## The Key Diagram, Map 7 Housing Growth Locations

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

### Summary:

In particular the Council is concerned that the cumulative growth impacts on transport, power, water supply have not been adequately addressed by the GNLP in its evidence base.

BDC within its adopted 2019 Local Plan 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. Breckland has concerns over water and power capacity as already mentioned.

Breckland also 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 whether there would be sufficient Railway capacity to cope with the increased growth.

Under the Duty to Cooperate, Breckland District Council would welcome the opportunity to early engagement with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas. This need for cooperation cannot be addressed via the NSPF

Summary of Breckland's Growth is around the A47 and A11

Breckland Growth along A11 in planned period

Attleborough 4383

Great Ellingham 195

Thetford 3666

Harling 250

Employment growth at Attleborough and Snetterton

Employment Growth at Thetford

Breckland Growth along A47

Dereham 1784

Swaffham 1553

Necton 283

Swanton Morley 184

### Change suggested by respondent:

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24223

Object

**The Settlement Hierarchy, Table 7 Housing growth 2018 to 2038 (figures rounded)****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Concerns about the Impact of cumulative growth

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24224

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

The significant cumulative growth from both GNLP and Breckland LP will require significant infrastructure planning to support both growth strategies

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24225

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Breckland would welcome discussion on the support of electric vehicles within the county but this would be a further pressure on the already constrained power work and would have to be carefully planned with neighbouring authorities.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24226

Object

**Introduction, Table 8 Key issues addressed by policy 2****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

9. water

Will policies on water efficiency be sufficient to cope with the cumulative growth of both GNLP and Breckland? What modelling has been done to look at cumulative growth impacts?

10. Energy

Will this be sufficient to deal with the already highlighted energy capacity problems when border district growth is taken into account?

The Greater Norwich Energy Infrastructure Study May 2019 did not consider neighbouring Breckland District's power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham within the scope of its study

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>



24227

Object

**Water, 251**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Does the non-requirement of additional water supply still hold when taking the Breckland Growth Plans into consideration as well?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24228

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure**

**Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]

**Summary:**

Would these improvements to infrastructure have a bearing on Breckland's growth plans?

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24229

Object

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**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Concerns over impact of cumulative growth

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: No

Comply with No  
duty:**Appear exam:** Not specified**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24230

Object

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**Elsewhere in the Urban area including the Fringe Parishes, 340****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Concerns over impact of cumulative growth

**Change suggested by respondent:**

-

Legally Yes  
compliant:

Sound: No

Comply with No  
duty:**Appear exam:** Not specified**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24231

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Concerns over impact of cumulative growth

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

24232

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Breckland District Council (Ms Rachel Gibbs, Planner) [19646]**Summary:**

Breckland District Council has strong reservations about the location and impact of these new settlements and the ability of the infrastructure on Breckland's communities in the area, as well as the impact on infrastructure- transport, health, power and water. The Council would welcome early discussions on these settlements under the duty cooperate requirement.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** Full Response - Breckland Council - <https://oc2connect.gnlp.org.uk/a/4bp>

23250

Object

**Policy 0312, 0312 Policy****Respondent:** Mr Simon Gibbs [19049]**Summary:**

Own home proximity to site. Our home looks directly over the proposed site and would ruin scenic views from our property. Build site would have noise and traffic pollution directly affecting our property on a constant basis for a number of years. Large influx of vehicles passing our house. Any entrance would cause constant light pollution from headlights. This amount of disruption would utterly ruin our home and reasons we chose to buy. Already suffered with expansion of local businesses adjacent to us. Large amount of wildlife in the proposed area and land actively used for farming still.

**Change suggested by respondent:**

Remove this site from the proposal/plan.

**Legally** Yes**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Appearance at the examination**Attachments:**

24204

Support

**Policy COS3/SL2008, COS3/SL2008 Map****Respondent:** Veolia ES (UK) Ltd (Belinder Gill) [19986]**Summary:**

Page. 23 of the Site Allocation Focus Map currently shows site reference GNLPSL2008 as an Employment Allocation, as highlighted in blue. However site reference GNLPSL2008 is not included with the 'Settlement Boundary' and the 'Redevelopment of Existing Uses within Settlement Boundary'. The boundary lines appear to stop at the halfway point of an existing employment site.

The site has a long history of permitted employment uses. Therefore Veolia consider that the remaining part of site referenced as GNLPSL2008 has been omitted from the Settlement Boundary in a drafting error, which should be corrected.

**Change suggested by respondent:**

The error should be corrected by extending the 'Settlement Boundary' line and the 'Redevelopment of Existing Uses within Settlement Boundary' line to include the whole of the operational site, reference GNLPSL2008, as already highlighted in blue on page. 23 of the Site Allocation Focus Map.

**Legally** Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23795

Object

**Policy 7.3 The Key Service Centres, 376****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

Please see enclosed representations letter for detail.

Glavenhill support the identification of Hethersett as a Key Service Centre but object to elements of the draft GNLP Growth Strategy, notably the amount of dispersal to rural parts of the plan area which is contrary to the vision to support growth in sustainable locations and within the Cambridge-Norwich Hi-Tech corridor.

This is the case within South Norfolk where 1,200 homes could all be allocated in small cluster villages in rural parts of the District, away from Key Service Centres.

The Strategy is not positively prepared or justified and is therefore unsound.

**Change suggested by respondent:**

Please see enclosed representations letter for further detail.

A justified and positively prepared strategy would be to allocate additional land for housing within the Key Service Centre of Hethersett and thus, in reflection of the Council's categorization of GNLP0480 as a 'reasonable alternative', allocate it for housing.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Regulation 19 Representation - Land west of New Road, Hethersett - redacted - <https://oc2connect.gnlp.org.uk/a/497>

23815

Object

**Great and Little Plumstead, 6.52****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

Glavenhill object to Broadland District Council's strategy for the village cluster of Great and Little Plumstead. They consider it to be neither 'positively prepared', 'justified' or 'effective' in delivering the houses needed within the village over the plan period and is therefore 'unsound'.

The decision not to allocate the proposed allocation site (GNLP0483R) is also considered unjustified and therefore 'unsound'. Glavenhill contend that the site is a suitable, available and deliverable option for SME housing that occupies no highway objection and can protect and provide a defensible boundary to, the open countryside to the west.

**Change suggested by respondent:**

The site would, if allocated, assist the Council in meeting an identified need for new housing in the Great and Little Plumstead village cluster which fails to be met through draft Policies 7.4 and 7.5 of the Regulation 19 Consultation Document.

The allocation of the site in response to an identified local housing need is entirely justified and would be considered positively prepared and therefore a 'sound' planning approach.

**Legally** Yes**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Appearance at the examination**Attachments:** Land to the east of Salhouse Road, Little Plumstead Reg 19 rep redacted - <https://oc2connect.gnlp.org.uk/a/49g>

23816

Object

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**Site Assessment Booklets and Studies, Village Clusters – Broadland Assessment Booklets****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

The decision not to allocate the proposed allocation site (GNLP0483R) is considered unjustified and therefore 'unsound'. Glavenhill contend that the site is a suitable, available and deliverable option for SME housing that occupies no highway objection and can protect and provide a defensible boundary to, the open countryside to the west.

**Change suggested by respondent:**

The site would, if allocated, assist the Council in meeting an identified need for new housing in the Great and Little Plumstead village cluster which fails to be met through draft Policies 7.4 and 7.5 of the Regulation 19 Consultation Document.

The allocation of the site in response to an identified local housing need is entirely justified and would be considered positively prepared and therefore a 'sound' planning approach.

**Legally** Yes**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Appearance at the examination**Attachments:** Land to east of Salhouse Road, Little Plumstead. Reg 19 rep redacted - <https://oc2connect.gnlp.org.uk/a/49h>

23821

Object

**Poringland, 5.50****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

The Council's decision not to allocate more housing in the Poringland Area is considered by Glavenhill to be unjustified and therefore unsound.

It is Glavenhill's opinion that it is appropriate to supplement local housing provision to support local needs and the continued vitality and viability of this Key Service Centre. This can and should be done through the allocation of suitable and deliverable sites such as Land to the south of Poringland Road, Upper Stoke (GNLP0494R).

**Change suggested by respondent:**

The proposed allocation site is suitable, available and deliverable and its allocation for residential use is a 'sound' proposition.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land to south of Poringland Road, Upper Stoke - Reg 19 rep redacted -  
<https://oc2connect.gnlp.org.uk/a/4v8>

23823

Object

**Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

The Council's decision not to allocate more housing in the Poringland Area is considered by Glavenhill to be unjustified and therefore unsound.

It is Glavenhill's opinion that it is appropriate to supplement local housing provision to support local needs and the continued vitality and viability of this Key Service Centre. This can and should be done through the allocation of suitable and deliverable sites such as Land to the south of Poringland Road, Upper Stoke (GNLP0494R).

**Change suggested by respondent:**

GNLP0494R is recommended for allocation. It is suitable, available and deliverable and its allocation for residential use is a 'sound' proposition.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land to south of Poringland Road, Upper Stoke - Reg 19 rep redacted -  
<https://oc2connect.gnlp.org.uk/a/4v9>



23868

Object

**Poringland, 5.50****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

The Council's decision not to allocate more housing in the Poringland Area is considered by Glavenhill to be unjustified and therefore unsound.

It is Glavenhill's opinion that it is appropriate to supplement local housing provision to support local needs and the continued vitality of this Key Service Centre as well as to provide much needed new primary education and recreation facilities. This can and should be done through the allocation of suitable and deliverable sites such as Land to the north of Caistor Lane, Caistor St Edmund (GNLP0485R).

**Change suggested by respondent:**

Allocate additional sites, including Land to the north of Caistor Lane, Caistor St Edmund (GNLP0485R) for a new country park, a site for a much needed new primary school, in the order of 180 new homes and a generous and beneficial package of community sought facilities.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Reg 19 reps - Land to north of Caistor Lane, Caistor St Edmund redacted - <https://oc2connect.gnlp.org.uk/a/4bc>

23878

Object

**Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

The discounting of the proposed allocation site (GNLP0485R) is unjustified and unsound.

In addition to supplementing housing supply, the allocation of this site, will provide much needed new primary school and community facilities which the Council has failed to consider.

The benefits to be delivered through the provision of a new Country Park at the site have failed to be assessed by the Council. The discounting of this site as a potential green infrastructure resource is unjustified.

The discounting of the site over access and highway concerns has also been demonstrated to be unjustified.

See enclosed representations for further detail.

**Change suggested by respondent:**

Land to the north of Caistor Lane, Caistor St Edmund (GNLP site reference GNLP0485R) can through its allocation provide for a new country park, a site for a much needed new primary school, in the order of 180 new homes and a generous and beneficial package of community sought facilities.

The proposed allocation site is a suitable, available and deliverable proposition which can deliver much needed facilities which fail to be planned for within the GNLP Regulation 19 Document.

The site should be allocated as a justified, positive and a wholly 'sound' proposition.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Reg 19 reps - Land to north of Caistor Lane, Caistor St Edmund redacted - <https://oc2connect.gnlp.org.uk/a/4bd>

23891

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Glavenhill Limited [19394]**Agent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

Glavenhill object to the lack of new sites being allocated for housing within Key Service Centres and the amount of dispersal to rural parts of the plan area. This is particularly the case within South Norfolk where 1,200 homes could all be allocated in small cluster villages in less sustainable rural parts of the District.

Glavenhill recommend that the quantum of allocations be redirected to support the stated ambitions for the Cambridge-Norwich Hi-Tech corridor and to reflect the sustainability of Key Service Centres such as Hethersett and Poringland / Framingham Earl.

**Change suggested by respondent:**

Glavenhill object to the lack of new sites being allocated for housing within Key Service Centres and the amount of dispersal to rural parts of the plan area. This is particularly the case within South Norfolk where 1,200 homes could all be allocated in small cluster villages in less sustainable rural parts of the District.

Glavenhill recommend that the quantum of allocations be redirected to support the stated ambitions for the Cambridge-Norwich Hi-Tech corridor and to reflect the sustainability of Key Service Centres such as Hethersett and Poringland / Framingham Earl.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Reg 19 reps - land to north of Caistor Lane, Caistor St Edmund redacted - <https://oc2connect.gnlp.org.uk/a/4bw>

Reg 19 reps - Land to south of Poringland Road, Upper Stoke - redacted - <https://oc2connect.gnlp.org.uk/a/4bf>

Reg 19 reps - Land west of New Road, Hethersett - redacted - <https://oc2connect.gnlp.org.uk/a/4bg>

23811

Support

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Glavenhill Ltd [19356]**Agent:** Lanpro Services Ltd (Mrs Beccy Rejzek) [16106]**Summary:**

If an allocation for a new Garden Village at Hethel is not made within this plan period, then policy 7.6 Preparing for New Settlements is supported. However, Glavenhill consider that a new Garden Village at Hethel should be allocated now and the choice to not allocate the Stanfield Garden Village site at Hethel within this plan period is a missed opportunity. Glavenhill's previously submitted comments on the Regulation 18C plan still stand.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Hethel Simple Delivery Statement 13\_03\_2021.pdf - <https://oc2connect.gnlp.org.uk/a/468>  
 Recieved June 2020 - Stanfield Garden Village - Landscape Viewpoint Photographs.pdf - <https://oc2connect.gnlp.org.uk/a/4gp>  
 Recieved June 2020 Stanfield Garden Village Utilities Note June 2019.pdf - <https://oc2connect.gnlp.org.uk/a/4gq>  
 Recieved June 2020 Strategic Ecology Assessment \_ 13June19\_V2.0 Final.pdf - <https://oc2connect.gnlp.org.uk/a/4hr>  
 20200928 Stanfield Garden Village - Mobility Vision - Final.pdf - <https://oc2connect.gnlp.org.uk/a/4hs>  
 Recd June 2020Stanfield Garden Village Utilities Constraints Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4ht>

23814

Support

**Homes, 135****Respondent:** Glavenhill Ltd [19356]**Agent:** Lanpro Services Ltd (Mrs Beccy Rejzek) [16106]**Summary:**

Glavenhill support the vision set out in this paragraph but do not consider that the policies in the plan will deliver this vision in the most effective way.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23818

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Glavenhill Ltd [19356]**Agent:** Lanpro Services Ltd (Mrs Beccy Rejzek) [16106]**Summary:**

Too great an emphasis is placed upon dispersal of growth to as yet unidentified sites in rural cluster villages in South Norfolk and to towns like Diss and Harleston, outside of the Cambridge-Norwich Tech Corridor and the Strategic Growth Area.

**Change suggested by respondent:**

Housing numbers should be redirected from Diss, Harleston and the South Norfolk rural cluster villages to a new settlement at Hethel. The policy should include the identification of a new settlement at Hethel. This approach would clearly support the ambition to provide most new homes in and around Norwich and within the Tech corridor and would provide land and homes to expand and support the opportunity for hi-tech engineering jobs within the Tech corridor.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23277

Support

**Education and Social Mobility, 75****Respondent:** Mr Phil Gledhill [12749]**Summary:**

This growth particularly applies to large developments such as Long Stratton which currently has a large catchment area. However, when Long Stratton expands dramatically in housing numbers, will Bunwell still be allowed to send their children there if extra provision is not made at the High School?

**Change suggested by respondent:**

-

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** None

23278

Support

**Emissions and Climate Change, 95****Respondent:** Mr Phil Gledhill [12749]**Summary:**

Initiatives such as Cluster Villages are designed to reduce reliance upon vehicle use for primary school trips. However, in reality this could prove of negligible benefit given many currently living near the schools still use the car. Non Cluster Villages will be starved of new housing and expansion opportunities. With electric car sales increasing significantly at last we need to see new initiatives now such as the compulsory installation of vehicle charging points in new houses. This particularly applies to rural areas where plug-in hybrids are a sensible option given greater distances travelled.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23279

Support

**Renewable Energy, 103****Respondent:** Mr Phil Gledhill [12749]**Summary:**

As a region we should be promoting the benefits of a medium to long term hydrogen strategy/infrastructure for buses, trucks and aviation. A significant amount of heavy transport operates within and through Norfolk and we should be leading the way. We also have plenty of water on 2 sides of the county, a huge component in its production.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23280

Support

**Landscape, 118****Respondent:** Mr Phil Gledhill [12749]**Summary:**

Norfolk has exceptional, far reaching landscapes but very few are protected as we would like. Local authorities and Government must be vigilant in the thoughtful and careful siting of developments going forward including housing and commercial and in particular avoiding land windfarms which are noise intrusive and unsightly on any landscape, particularly a flat one.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23825

Object

**Policy 2109, 2109 Policy****Respondent:** Goff Petroleum [19959]**Agent:** Lanpro Services Ltd (Mrs Beccy Rejzek) [16106]**Summary:**

We support the allocation of the land South of Hethel Industrial Estate but consider that land at Stanfield Road, Wymondham (GNLP0116) should also be allocated for the reasons we have set out previously. Our previous representations submitted at Regulation 18C stage still stand.

**Change suggested by respondent:**

Additional allocation of GNLP0116 for employment use.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

## Rackheath, Settlement Map

**Respondent:** Kevin Goodwin [19980]

**Petition:** 2 petitioners

### Summary:

This policies map identifies sites have been put forward for development as part of the 'call for sites'.

In relation to Rackheath Park there are three areas of land - one red GNLP0172 and two that are grey GNLP4001 and GNLP0478, although this latter site is divided by the NDR.

The former site is land that is divided by the NDR and has a resolution to grant planning permission. The land on the west side of the NDR under that application is proposed as open space, with no housing development. In that respect the consultee's views are supportive.

However the latter two sites are within Rackheath Park, an undesignated heritage asset. We have noted that these site is not presently proposed for development and we support the decision not to designate the sites. To do so would adversely impact on the local landscape and the designated and non-designated heritage assets in the Park, especially Rackheath Hall. There are also other ecological, traffic and other reasons why any allocation here would be contrary to both the extant AAP and the Framework.

Site GNLP4001 has been promoted for 82 dwellings and Site GNLP0172 for 142 dwellings. Neither are by any means 'small scale' and in accordance with Policy GT2 in the AAP.

Notwithstanding this the land owners of Site GNLP4001 have made a hybrid application that we have objected to in detail.

### Change suggested by respondent:

Fully support the non-designation of Sites GNLP4001 and GNLP0478 as housing sites.

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



24150

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Kevin Goodwin [19980]**Petition:** 2 petitioners**Summary:**

This policy deals with the provision of new homes in the area. However the opening part of the policy states "Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs". Whilst there are broad references in other policies it fails to states that new housing should be sustainable and not constitute isolated homes within the countryside, contrary to the Framework.

**Change suggested by respondent:**

Modify the plan to include the additional topic references above.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

24151

Object

**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development****Respondent:** Kevin Goodwin [19980]**Petition:** 2 petitioners**Summary:**

This policy deals with 'small scale windfall developments' in "each parish beyond those allocated or allowed for as larger scale windfall sites through other policies in this plan". The policy states "Small scale residential development will be permitted adjacent to a development boundary or on sites within or adjacent to a recognisable group of dwellings". The latter part of this reference, that would allow development adjacent to a group of dwellings, is in conflict with paragraph 79 of the Framework as recently confirmed in the Courts. In the context of the Framework these would be considered isolated dwellings in the countryside. The Framework is clear that they would be isolated from any settlement and so contrary to the Framework.

**Change suggested by respondent:**

Modify the plan to ensure that it reflects paragraph 79 of the Framework.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

24152

Object

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**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Kevin Goodwin [19980]**Petition:** 2 petitioners**Summary:**

This policy deals with the provision of Sustainable Communities. This approach is guided by the eight key issues in the supporting text.

But the policy, in our view, when it relies on these issues is not simply a matter of looking at one and addressing that individually. Many of these key issues have cross relationships, such as Green Infrastructure, scale, landscape and heritage, that all appear separately in the list of Key Issues

**Change suggested by respondent:**

Modify the plan to ensure that it is clear that the Key Issues do not work in isolation of each other and it will be important in decision making to ensure that any effect arising from one key issue is also cross referenced in any effect on one of more other Key Issue.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23599

Object

**Aylsham, 4.5****Respondent:** Margaret Goose [19919]**Summary:**

As a resident of Aylsham, I attended a consultation event in the Town Hall on the proposals for this area as part of the development of the GNIP; and left comments.

I was therefore somewhat astonished to discover that, at a later stage in the process, a significant further housing development had been proposed.

This does not seem to be an appropriate use of Regulation 19 and I object to such a significant change being included without further consultation, particularly when the issues raised during the initial consultation have not apparently been addressed.

I have read the response of Aylsham Town Council and would ask that my objection to the use of Regulation 19 be registered, endorsing the points made by the Town Council. I also endorse their request that the proposal for a second site for significant housing development be withdrawn and more evidence supplied of how the planning team have addressed the issues raised in the Town Council's response to the proposals consulted on under Regulation 18.

**Change suggested by respondent:**

As a resident of Aylsham, I attended a consultation event in the Town Hall on the proposals for this area as part of the development of the GNIP; and left comments.

I was therefore somewhat astonished to discover that, at a later stage in the process, a significant further housing development had been proposed.

This does not seem to be an appropriate use of Regulation 19 and I object to such a significant change being included without further consultation, particularly when the issues raised during the initial consultation have not apparently been addressed.

I have read the response of Aylsham Town Council and would ask that my objection to the use of Regulation 19 be registered, endorsing the points made by the Town Council. I also endorse their request that the proposal for a second site for significant housing development be withdrawn and more evidence supplied of how the planning team have addressed the issues raised in the Town Council's response to the proposals consulted on under Regulation 18.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** None

24113

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Gosford Ltd [20049]**Agent:** Woods Hardwick Planning Ltd (Paul Woods) [19974]**Petition:** 2 petitioners

**Summary:**

We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:

1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and
2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.

We set out our reasoning below.

The inclusion of policy 7.5 and windfall allowance sites

We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.

Please refer to continuation page.

**Change suggested by respondent:**

We consider that the Plan's total housing potential figure at Table 6 should exclude homes delivered through policy 7.5 under E and windfall allowance under F and should be made up as follows:

- A Local Housing Need (2018 to 2038) - 40,541
- B Delivery 2018/2019 and 2019/20 - 5,240
- C Existing commitment to be delivered to 2038 – 31,452
- D New Allocations – 11,957

Total Housing Potential – 48,649

The Explanation under D should be adjusted to read: 'These are the homes to be provided on new sites allocated through the GNLP (9,871), the South Norfolk Village Clusters Housing Allocations Plan (1,836) and the Diss and area Neighbourhood Plan (250)'.'

Please refer to continuation page.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 Continuation - <https://oc2connect.gnlp.org.uk/a/49z>  
Question 6 Continuation Page - <https://oc2connect.gnlp.org.uk/a/49m>

24114

Object

**Housing Growth Needs, Table 6 Establishing the Plan's total housing potential figure****Respondent:** Gosford Ltd [20049]**Agent:** Woods Hardwick Planning Ltd (Paul Woods) [19974]**Petition:** 2 petitioners**Summary:**

We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:

1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and
2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.

We set out our reasoning below.

The inclusion of policy 7.5 and windfall allowance sites

We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.

Please refer to continuation page.

**Change suggested by respondent:**

We consider that the Plan's total housing potential figure at Table 6 should exclude homes delivered through policy 7.5 under E and windfall allowance under F and should be made up as follows:

A Local Housing Need (2018 to 2038) - 40,541

B Delivery 2018/2019 and 2019/20 - 5,240

C Existing commitment to be delivered to 2038 – 31,452

D New Allocations – 11,957

Total Housing Potential – 48,649

The Explanation under D should be adjusted to read: 'These are the homes to be provided on new sites allocated through the GNLP (9,871), the South Norfolk Village Clusters Housing Allocations Plan (1,836) and the Diss and area Neighbourhood Plan (250).'...

Please refer to continuation page.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 Continuation - <https://oc2connect.gnlp.org.uk/a/49z>

Question 6 Continuation Page - <https://oc2connect.gnlp.org.uk/a/49m>

24115

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Gosford Ltd [20049]

**Agent:** Woods Hardwick Planning Ltd (Paul Woods) [19974]

**Petition:** 2 petitioners

### Summary:

We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:

1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and
2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.

We set out our reasoning below.

The inclusion of policy 7.5 and windfall allowance sites

We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.

Please refer to continuation page.

### Change suggested by respondent:

We consider that the Plan's total housing potential figure at Table 6 should exclude homes delivered through policy 7.5 under E and windfall allowance under F and should be made up as follows:

A Local Housing Need (2018 to 2038) - 40,541

B Delivery 2018/2019 and 2019/20 - 5,240

C Existing commitment to be delivered to 2038 – 31,452

D New Allocations – 11,957

Total Housing Potential – 48,649

The Explanation under D should be adjusted to read: 'These are the homes to be provided on new sites allocated through the GNLP (9,871), the South Norfolk Village Clusters Housing Allocations Plan (1,836) and the Diss and area Neighbourhood Plan (250)'.'

Please refer to continuation page.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 Continuation - <https://oc2connect.gnlp.org.uk/a/49z>

Question 6 Continuation Page - <https://oc2connect.gnlp.org.uk/a/49m>

24116

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Gosford Ltd [20049]**Agent:** Woods Hardwick Planning Ltd (Paul Woods) [19974]**Petition:** 2 petitioners**Summary:**

We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:

1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and
2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.

We set out our reasoning below.

The inclusion of policy 7.5 and windfall allowance sites

We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.

Please refer to continuation page.

**Change suggested by respondent:**

We consider that the Plan's total housing potential figure at Table 6 should exclude homes delivered through policy 7.5 under E and windfall allowance under F and should be made up as follows:

- A Local Housing Need (2018 to 2038) - 40,541
- B Delivery 2018/2019 and 2019/20 - 5,240
- C Existing commitment to be delivered to 2038 – 31,452
- D New Allocations – 11,957

Total Housing Potential – 48,649

The Explanation under D should be adjusted to read: 'These are the homes to be provided on new sites allocated through the GNLP (9,871), the South Norfolk Village Clusters Housing Allocations Plan (1,836) and the Diss and area Neighbourhood Plan (250).'...

Please refer to continuation page.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 Continuation - <https://oc2connect.gnlp.org.uk/a/49z>  
Question 6 Continuation Page - <https://oc2connect.gnlp.org.uk/a/49m>

24117

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Gosford Ltd [20049]**Agent:** Woods Hardwick Planning Ltd (Paul Woods) [19974]**Petition:** 2 petitioners**Summary:**

We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:

1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and
2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.

We set out our reasoning below.

The inclusion of policy 7.5 and windfall allowance sites

We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.

Please refer to continuation page.

**Change suggested by respondent:**

We consider that the Plan's total housing potential figure at Table 6 should exclude homes delivered through policy 7.5 under E and windfall allowance under F and should be made up as follows:

- A Local Housing Need (2018 to 2038) - 40,541
- B Delivery 2018/2019 and 2019/20 - 5,240
- C Existing commitment to be delivered to 2038 – 31,452
- D New Allocations – 11,957

Total Housing Potential – 48,649

The Explanation under D should be adjusted to read: 'These are the homes to be provided on new sites allocated through the GNLP (9,871), the South Norfolk Village Clusters Housing Allocations Plan (1,836) and the Diss and area Neighbourhood Plan (250).'

Please refer to continuation page.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 Continuation - <https://oc2connect.gnlp.org.uk/a/49z>

Question 6 Continuation Page - <https://oc2connect.gnlp.org.uk/a/49m>



24118

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Gosford Ltd [20049]**Agent:** Woods Hardwick Planning Ltd (Paul Woods) [19974]**Petition:** 2 petitioners**Summary:**

We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:

1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and
2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.

We set out our reasoning below.

The inclusion of policy 7.5 and windfall allowance sites

We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.

Please refer to continuation page.

**Change suggested by respondent:**

We consider that the Plan's total housing potential figure at Table 6 should exclude homes delivered through policy 7.5 under E and windfall allowance under F and should be made up as follows:

- A Local Housing Need (2018 to 2038) - 40,541
- B Delivery 2018/2019 and 2019/20 - 5,240
- C Existing commitment to be delivered to 2038 – 31,452
- D New Allocations – 11,957

Total Housing Potential – 48,649

The Explanation under D should be adjusted to read: 'These are the homes to be provided on new sites allocated through the GNLP (9,871), the South Norfolk Village Clusters Housing Allocations Plan (1,836) and the Diss and area Neighbourhood Plan (250).'...

Please refer to continuation page.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 Continuation - <https://oc2connect.gnlp.org.uk/a/49z>  
Question 6 Continuation Page - <https://oc2connect.gnlp.org.uk/a/49m>

23947

Object

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**Introduction, 301****Respondent:** Robert Gower [19504]**Summary:**

See proposed correction and amendment for consistency and soundness below.

**Change suggested by respondent:**

Propose correction from "during the plan period" to "from adoption of the plan" for consistency with paragraph 389 and Appendix 7.

Amend wording to add "...of up to 3 to 5 dwellings per parish OR MORE WHERE JUSTIFIED" in accordance with representation to Policy 1.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Appendix 3 - <https://oc2connect.gnlp.org.uk/a/47d>

Appendix 2 - <https://oc2connect.gnlp.org.uk/a/47w>

Appendix 1 - <https://oc2connect.gnlp.org.uk/a/47f>

Supplemental statement - Reg 18 rep - <https://oc2connect.gnlp.org.uk/a/4wm>

23948

Support

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Robert Gower [19504]**Summary:**

The Policy 1 approach to windfall housing growth is supported as it provides flexibility to respond to higher economic growth and opportunities for self and custom build housing in accordance with the NPPF's recognition of the important contribution of small sites (NPPF Paragraph 68) and those wishing to build or commission their own homes (NPPF Paragraph 61).

Please refer to separate representations made to Policy 7.4 and 7.5.

**Change suggested by respondent:**

Point 3 should be amended to read "...of up to 3 or 5 dwellings in all parishes, OR MORE WHERE JUSTIFIED subject to the requirements of policy 7.5" for the reasons explained in our representation to Policy 7.5.

**Legally** Yes

**compliant:**

**Sound:** Yes

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** Appendix 3 - <https://oc2connect.gnlp.org.uk/a/47d>

Appendix 2 - <https://oc2connect.gnlp.org.uk/a/47w>

Appendix 1 - <https://oc2connect.gnlp.org.uk/a/47f>

Supplemental statement - Reg 18 rep - <https://oc2connect.gnlp.org.uk/a/4wm>

23950

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Robert Gower [19504]

### Summary:

The policy permitting small scale windfall housing development beyond those allocated or allowed for as windfall sites under Policy 7.4 is supported, as it provides opportunities for self and custom build housing in accordance with the NPPF's recognition of the important contribution of small sites (NPPF Paragraph 68) and those wishing to build or commission their own homes (NPPF Paragraph 61), and helps to support local services.

There is some inconsistency in the wording of the plan on the application of the upper limit of 3 or 5 dwellings. The wording of the policy suggests it permits cumulative development of up to a TOTAL of 3 dwellings per small parish, or up to a TOTAL of 5 dwellings per large parish. Elsewhere, such as paragraph 301, 348 and 379, the wording suggests the policy permits up to 3 dwellings PER SITE in small parishes and up to 5 dwellings PER SITE in large parishes.

We would support the latter approach as imposing a limit on the number of dwellings permitted per site would ensure an appropriate scale of development per site for the size of the parish which can be further assessed on a site by site basis by the application of bullet points 2 and 3 of the policy.

However, our understanding is that the policy is intended to restrict the cumulative number of dwellings to 3 or 5 dwellings per Parish. This being the case, although we support the differentiation between the capacity of smaller and larger parishes, we propose that the imposition of a rigid upper cumulative limit of 3 or 5 dwellings is an arbitrary restriction that cannot be evidenced or justified. We therefore question whether this has implications for soundness.

### Change suggested by respondent:

We propose that the policy could permit small scale windfall development above the specified limits where it is demonstrated that the cumulative number of dwellings permitted does not have an adverse impact on the character or scale of the settlement or the Parish, which would enable every proposal to be determined on its merits.

The wording of the first bullet point should be corrected from "during the lifetime of the plan" to "after adoption of the plan" for consistency with paragraph 389 and Appendix 7.

We also propose adding clarification in the supporting text that the cumulative number of dwellings permitted under Policy 7.5 is separate to windfall permitted under other policies of the plan e.g. Policy 7.4.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** Appendix 3 - <https://oc2connect.gnlp.org.uk/a/47d>

Appendix 2 - <https://oc2connect.gnlp.org.uk/a/47w>

Appendix 1 - <https://oc2connect.gnlp.org.uk/a/47f>

Supplemental statement - Reg 18 rep - <https://oc2connect.gnlp.org.uk/a/4wm>

23949

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Robert Gower [19504]**Summary:**

The policy to allow infill development within settlement boundaries of village clusters is supported. The identification on the proposals map of a settlement boundary at Thorpe End on the Proposals Map is supported.

However, the GNDP had proposed to undertake a review of settlement boundaries. The Great and Little Plumstead Settlement Booklet states: "Sites of less than 0.5ha are not considered suitable for allocation and therefore have not been assessed in this booklet. These sites will be considered as part of a reappraisal of settlement boundaries to be published with the Regulation 19 Submission version of the Plan". The GNLP Reg 19 Consultation Website states: "Previously defined Settlement Boundaries have been brought forward into the plan without amendment". It is not clear from the consultation document or the evidence base whether this reappraisal of settlement boundaries has taken place and if so where the appraisal process and findings are reported.

We submitted representations to the Reg 18c consultation proposing the inclusion of site GNLP3006 within the settlement boundary for Thorpe End (please refer to representation 21170). We propose there may be issues with soundness if the reappraisal has not taken place as planned because the settlement boundaries will otherwise be based on out of date evidence. For example, the settlement boundary to the south east of Thorpe End no longer reflects the true physical boundary now apparent on the ground which has come about due to changes in land use over 10 years ago. A settlement boundary reappraisal would enable the inclusion of a suitable plot for one dwelling on site GNLP3006. There are likely to be many other plots such as this that would otherwise have been identified through the reappraisal process. Failing to undertake the settlement boundary reappraisal would therefore result in a lost opportunity to encourage windfall development to come forward on the most suitable sites.

**Change suggested by respondent:**

To ensure the plan is sound we propose that the settlement boundary reappraisal should take place before the plan is submitted for examination. Alternatively, the wording of Policy 7.4 should be amended to allow small scale windfall development on sites that are assessed on a case by case basis as forming a natural adjustment to the settlement boundary. As this assessment would be taking place on an ad hoc basis in lieu of a holistic settlement boundary reappraisal it is therefore proposed that windfall development permitted under this policy should be separate to the cumulative number of dwellings per parish allowed for under Policy 7.5.

For clarity, we also propose there should be a consistent use of either "settlement boundary" or "development boundary".

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** Appendix 3 - <https://oc2connect.gnlp.org.uk/a/47d>  
Appendix 2 - <https://oc2connect.gnlp.org.uk/a/47w>  
Appendix 1 - <https://oc2connect.gnlp.org.uk/a/47f>  
Supplemental statement - Reg 18 rep - <https://oc2connect.gnlp.org.uk/a/4wm>

23829

Support

**Rackheath, Settlement Map**

**Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]

**Summary:**

The Plan should be updated to reflect recent planning permissions.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23657

Support

**Policy HNF2 0466R, 6.75**

**Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]

**Summary:**

Support subject to changing allocation boundary to reflect incorporation of safeguarded land for Broadland Northway.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23667

Support

**Policy HNF2 0466R, HNF2 0466R Policy****Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]**Summary:**

Support the allocation, subject to the proposed boundary change.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23666

Object

**Policy 0596R, 0596R Policy****Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]**Summary:**

It appears this site has been introduced very late in the process with due consultation.

Its proximity to Diggens Farm has the potential to impact on the amenity of its residents and give rise to other effects detailed in the main submission.

**Change suggested by respondent:**

This site should be omitted.

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Appearance at the examination**Attachments:** None

23775

Support

**Existing allocations to be carried forward, 3.60****Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]**Summary:**

The GT 16 Allocation in the Growth Triangle Area Action Plan is supported and planning applications are currently being prepared to see the site developed.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23830

Object

**Rackheath, 3.55****Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]**Summary:**

Proposed site GNLP0478 should also be carried forward as an allocation.

**Change suggested by respondent:**

Proposed site GNLP0478 should also be carried forward as an allocation.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None



23831

Object

**Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets****Respondent:** GP Planning Ltd (GP Plannin Maureen Darrie, Director) [14933]**Summary:**

Proposed site GNLP0478 should be allocated.

**Change suggested by respondent:**

Proposed site GNLP0478 should be allocated.

**Legally compliant:** No**Sound:** No**Comply with duty:** Yes**Appear exam:** Appearance at the examination**Attachments:** None

24323

Object

**East Norwich, 2.6****Respondent:** Lesley Grahame [20000]**Summary:**

Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the the success or otherwise of the project. Local opinion has previously shown enthusiasm for pedestrian and cycle links to Whitlingham. This is an opportunity to provide pedestrian and cycle links between Norwich and Whitlingham. If this opportunity is not taken the local transport system will not allow people to make the journeys they want to make and an opportunity to lower carbon emissions will have been lost.

However a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, adding noise and pollution and reducing air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas

While there may be a balance of conflicting needs, this policy cannot meet the soundness test for effectiveness as its delivery would cause significant harm to the objectives

Pleased to see co-ordination accross sites and the integration of sustainable transport.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** No**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** GNLP TH respomse Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24324

Object

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**East Norwich, 2.9****Respondent:** Lesley Grahame [20000]**Summary:**

2.9 Creating a new urban area will have huge impact on surrounding residents, and must engage the m at an early stage. Resident consultation is vital in the design and development of this new site. Without good, early consultation with the local community, opportunities for improvement and suitable development may be missed.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24325

Object

**East Norwich, 2.10****Respondent:** Lesley Grahame [20000]**Summary:**

2.10

The harm would be reduced if a low car neighbourhood were created, as in 2.11, which will need adherence along with excellent non-car alternatives as proposed

viii Energy efficiency standards should reflect the best aspirations, at least passivhaus standard, but well beyond legal minimum in order to meet the legal requirement of zero carbon by 2050, and the physical, non-negotiable 6th Carbon budget.

Embodied carbon of building materials and precesses must also be accounted to be consistent with national policy and therefore sound

ix The area covered by the Norwich East Partnership is prone to flooding. If this area is developed, detailed plans will be needed to mitigate against this risk.

xi

A new inclusive riverside community needs to include residential moorings and related facilities in order to be effective in delivering the sustainable development objectives that meet the needs of all

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH respomse Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24326

Object

**Land at Deal Ground, 2.11****Respondent:** Lesley Grahame [20000]**Summary:**

Developing the Deal Ground has received mixed views from residents who welcome the cycle bridge but have also raised concerns about the height, design quality and durability, flood resilience, traffic issues.

The new settlement must be built to at least passivhaus standards and have a traffic neutral impact, if not traffic negative

be consistent with the Climate Change Act and national planning policy and therefore sound. Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH respomse Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24327

Object

**Land at Deal Ground, 2.14****Respondent:** Lesley Grahame [20000]**Summary:**

Flood events are becoming more frequent and the percentage calculations may /may not have been updated to take this into account. A precautionary approach is necessary if the plan is to be deliverable for the long term and effective .

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH respomse Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24328

Object

**Utilities, 2.25****Respondent:** Lesley Grahame [20000]**Summary:**

2.25 -7

Utilities site

Has been previously allocated to renewable energy production. Some local people had hoped to benefit from CHP (community heat and power) but this was never part of the plan. There was near universal rejection of biomass burning for reasons of air quality, land use change (deforestation, loss of indigenous and agricultural land) to source wood pellets - all of which have since received more recognition as negative for sustainability.

Given the increasing population density of the area, it would be sensible to rule out any combustion process and require energy to be generated from recognisably clean sources such as solar, wind, heat pumps. The rejected option of biomass burning could be considered as an alternative, against which genuinely clean renewable non-combustion energy is positive, justified, effective and consistent.

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24329

Object

**Utilities, 2.26****Respondent:** Lesley Grahame [20000]**Summary:**

2.25 -7

Utilities site

Has been previously allocated to renewable energy production. Some local people had hoped to benefit from CHP (community heat and power) but this was never part of the plan. There was near universal rejection of biomass burning for reasons of air quality, land use change (deforestation, loss of indigenous and agricultural land) to source wood pellets - all of which have since received more recognition as negative for sustainability.

Given the increasing population density of the area, it would be sensible to rule out any combustion process and require energy to be generated from recognisably clean sources such as solar, wind, heat pumps. The rejected option of biomass burning could be considered as an alternative, against which genuinely clean renewable non-combustion energy is positive, justified, effective and consistent.

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24330

Object

**Utilities, 2.27****Respondent:** Lesley Grahame [20000]**Summary:**

2.25 -7

Utilities site

Has been previously allocated to renewable energy production. Some local people had hoped to benefit from CHP (community heat and power) but this was never part of the plan. There was near universal rejection of biomass burning for reasons of air quality, land use change (deforestation, loss of indigenous and agricultural land) to source wood pellets - all of which have since received more recognition as negative for sustainability.

Given the increasing population density of the area, it would be sensible to rule out any combustion process and require energy to be generated from recognisably clean sources such as solar, wind, heat pumps. The rejected option of biomass burning could be considered as an alternative, against which genuinely clean renewable non-combustion energy is positive, justified, effective and consistent.

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24331

Object

**East Norwich, 2.7****Respondent:** Lesley Grahame [20000]**Summary:**

Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the the success or otherwise of the project. Local opinion has previously shown enthusiasm for pedestrian and cycle links to Whitlingham. This is an opportunity to provide pedestrian and cycle links between Norwich and Whitlingham. If this opportunity is not taken the local transport system will not allow people to make the journeys they want to make and an opportunity to lower carbon emissions will have been lost.

However a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, adding noise and pollution and reducing air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas

While there may be a balance of conflicting needs, this policy cannot meet the soundness test for effectiveness as its delivery would cause significant harm to the objectives

Pleased to see co-ordination accross sites and the integration of sustainable transport.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP TH respomse Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>



24332

Object

**East Norwich, 2.8****Respondent:** Lesley Grahame [20000]**Summary:**

Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the the success or otherwise of the project. Local opinion has previously shown enthusiasm for pedestrian and cycle links to Whitlingham. This is an opportunity to provide pedestrian and cycle links between Norwich and Whitlingham. If this opportunity is not taken the local transport system will not allow people to make the journeys they want to make and an opportunity to lower carbon emissions will have been lost.

However a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, adding noise and pollution and reducing air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas

While there may be a balance of conflicting needs, this policy cannot meet the soundness test for effectiveness as its delivery would cause significant harm to the objectives

Pleased to see co-ordination accross sites and the integration of sustainable transport.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP TH respomse Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24333

Object

**CC4, CC4A Policy****Respondent:** Lesley Grahame [20000]**Summary:**

Policy CC4: Land at Rose Lane/Mountergate | GNLP

More employment is to be welcomed, tho as noted, this must be compatible with the high density residential areas that surround CC4a and b

CC4a includes the area currently known as Rose Lane Garden. This space adds little to the potential housing number or office footage, but provides significant value to local residents present and future. I request that this small part be removed from cc4a, renamed as cc4c and allocated as Local Green Space (which could be greatly enhanced by CIL or 106 contributions form the rest of the site.) This would contribute to the wellbeing of the many people living nearby with little access to nearby green space, and to soundness by meeting the need in Para 8b of NPPF

b) a social objective– to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24334

Object

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**CC7, CC7 Policy****Respondent:** Lesley Grahame [20000]**Summary:**

CC7, Horborough Lane

Development is sound so long as it protects trees and proposed river access and walk

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** No**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24335

Object

**CC8, CC8 Policy****Respondent:** Lesley Grahame [20000]**Summary:**

Policy CC8 - King Street Stores, Norwich (approx. 0.21 ha) is allocated for residential use, with a minimum of 20 homes. Current policies prioritise the recreation of the historic streetscape of King Street, building right up to the road. While this may be appropriate at the northern, city end of King Street, it is no longer appropriate for the area covered by policy CC8, particularly as a number of mature trees now line the boundary between the site and the highway. It would be beneficial to keep these trees and to develop housing around them, in a careful manner which does not damage them. These mature trees are important as they help battle flooding, urban heating, climate change and biodiversity loss. The retention of these trees and the boundary wall outweighs the reinstatement of the street frontage. As the trees have matured over the last few years since policy decisions about this site were made, they are now of greater value, so policies affecting this site should be revised. Furthermore, we would like to see the retention of the warehouse buildings on this site, preferring to see them renovated and re-used, most likely for accommodation, rather than demolished. River access and the further retention and promotion of biodiversity also need to be considered as this site is developed.

The number and size of homes should not be more than is compatible with retaining both the heritage building and the existing mature trees

Whole life cycle carbon ana

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24336

Object

**CC15, CC15 Policy****Respondent:** Lesley Grahame [20000]**Summary:**

CC15

Royal mail site - 15-17 Thorpe Road

This is a mbrownfield site where employment and residential uses are welcome.

The boundary for this site contains a number of mature trees in need of protection -

at the corners of Stracey Road/Lower Clarence Road, and Stracey Road and Thorpe Road. Between them is a deciduous hedge that may provide connectivity for wildlife between Rosary Cemetery and the railway embankment.

There are also 3 holly trees on the Thorpe Road boundary near the main entrance to the site.

These trees should be retained and protected.

It's not clear if Built frontages (Clause 2) mean building up to the pavement, which would require removal of healthy beneficial trees and create a claustrophobic feel on the pavement, as well as reducing the options for gardens within the site. If so, this clause should be removed as th conflict with biodiversity and climate change requirements, and with the character and amenity of the area would make this part of the plan unsound.

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24337

Object

**CC16, CC16 Policy****Respondent:** Lesley Grahame [20000]

**Summary:**

Policy CC16: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way

2.196 The draft deems this 'site is critical to unlocking the regeneration of the wider area', I welcome the proposed 'comprehensive approach to be taken to access, particularly in terms of public transport links and pedestrian and cycle links' and would like to add two additional points:

The re-opening a rail halt at Trowse would be a highly valued aspiration and solution

There is only a very small park for children from a large area, growing in population to play. I would like to propose that the part of the site bordered by Kerrison Road, The Community Sports Foundation and Canary Way be taken out of the allocation and returned to its historic use as park/playground in addition the tiny park that replaced it when it was turned into a car park in 1990s.

Residents who objected when the children's playground was turned into a car park say they were told at the time that when the flats on Geoffrey Watling were occupied a larger park would be needed. This should be in the Local Plan, and land on south side of Canary Fields reserved for much needed open public space . This change would contribute to the social, economic and environment objectives of Para 2 in NPPF, the requirement for high quality of surrounding developments, justified against alternatives, and therefore to the overall soundness. The population of the area has increased and will continue to do so, therefore more open amenity space is required for the plan to be sound.

With rapidly growing communities in the flats here, there is considerable need for more facilities and better transport. Current residents have a bus gate but no buses towards Wherry Road, and only one way to access and exit their homes by road onto Carrow Road. This needs to be remedied to meet the traffic neutral needs called for elsewhere, and the climate change requirements.

This is implied in in para 2.196 and is essential to the deliverability and consistence and therefore soundness of the plan Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24338

Object

**CC17a and CC17b, 2.206****Respondent:** Lesley Grahame [20000]**Summary:**

Policy CC17a and CC17b: Land at Barrack Street/Whitefriars

Barrack Street

<https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-2-norwich-new-allocations/policy-gnlp0409ar-gnlp0409br-land>

This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation

Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target

**Change suggested by respondent:**

-

**Legally Not specified compliant:****Sound:** No**Comply with Not specified duty:****Appear exam:** Not specified**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24339

Object

**R13, R13 Policy****Respondent:** Lesley Grahame [20000]**Summary:**

Policy R13

Site of former Gas Holder at Gas Hill, Norwich (approx. 0.30ha) is allocated for residential development. This will accommodate a minimum of 15 homes.

Given the acknowledged constraints of the site, the steep hill and surrounding woodland, and the risks to properties above from undermining the hill on which they stand, a more sound plan would be to keep the area as woodland, helping to meet biodiversity and climate objectives and removing a risk to Thorpe Ridge Conservation area. The maturity of these trees, and the alarming facts and growing knowledge about biodiversity loss creates grounds, and indeed a need for updating both site specific and DM policies to reflect the need for preservation.

If this site were to be developed, soundness requires whole life cycle carbon analysis on all buildings

**Change suggested by respondent:**

-

**Legally Not specified compliant:****Sound:** No**Comply with Not specified duty:****Appear exam:** Not specified**Attachments:** GNLP TH response Final.docx - <https://oc2connect.gnlp.org.uk/a/4dw>

24193

Object

**Salhouse, Settlement Map****Respondent:** Grand Vision Developments Ltd [19518]**Agent:** Mr Jon Jennings [19303]**Petition:** 2 petitioners**Summary:**

These representations relate to site GNLP0487 – Land to the North of Norwich Road, Salhouse. Representations were submitted in the Regulation 18 Consultation on the basis that the proposal would provide a 60-bed care home and circa 90 dwellings for over 55 years residents. This proposal was also looking to provide a significant level of Green Infrastructure.

The proposal is seeking to meet the objectives of Policy 41 of the plan in that “Development will also need to be designed to include high quality green infrastructure and community facilities to encourage healthy and active lifestyles, including healthy ageing and active retirement. Good quality housing and local access to facilities for all will be needed to reduce inequalities. This will assist in reducing health inequalities”

Following the comments made in relation to this site, as detailed on the attached masterplan, a smaller scale form of development is proposed providing 40 dwellings, both market and affordable housing and a 60-bed care home. The development proposal has been located so that it more readily adjoins the built development in Salhouse and the proposed Green Infrastructure will reinforce the physical separation between Salhouse and Rackheath. However, it should be noted that this site will be looking to utilise and access the wide range of facilities within Rackheath, which are located approximately 750m to the south west. It is important to stress that the site is not proposing family housing and as a consequence the impact on Salhouse Primary School will be minimal.

Whilst, the Council have assessed the site in the Stage 2 – HELAA Comparison Table, there are questions as to the accuracy of the scores applied and it is considered important that further information is provided to correct these inaccuracies.

This site is currently subject to a yet undetermined application 20170243- Residential development comprising a minimum of 95 dwellings including affordable housing, landscaping, car parking and 7.01 hectares of publicly accessible green infrastructure containing children's play equipment, tree planting and a 30 space visitor car park (Outline). This application has demonstrated that a safe means of access can be created onto Norwich Road. The speed limit on this road has recently been reduced to 40mph and there are questions as to the accuracy of the score applied and whether this should be changed from amber to green.

See continuation sheet

**Change suggested by respondent:**

There are questions as to the soundness of this part of the plan and whether the Council has fully assessed the attributes of this site and that this site has easy access to facilities within Rackheath. The proposed development has been designed to be closely related to the existing built development fronting Norwich Road and as stated in the HELAA Comparison Table the original site is not considered to have adverse landscape and townscape impacts.

The reduction in the scale of development has resulted in a corresponding increase in open space and Green Infrastructure and biodiversity and the wider benefits of these needs to be properly considered. The change in the scale and location of the development also needs to be considered as the current assessments are not based on up to date information.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes



**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Question 5 continuation sheet - GNLP0487 Land north of Norwich Road, Salhouse 19.03.21.pdf -  
<https://oc2connect.gnlp.org.uk/a/4b9>  
Location Plan 1 - <https://oc2connect.gnlp.org.uk/a/4bv>  
Location Plan 2 - <https://oc2connect.gnlp.org.uk/a/4bb>

23593

Object

**Aylsham, Settlement Map****Respondent:** Mr & Mrs Gravenell [19917]**Petition:** 2 petitioners**Summary:**

We are utterly furious with the latest plans for Aylsham that have been increased from 300 to 550 new houses. This has been done without any reference to the local community and makes an utter farce of the whole consultation process that we have been through in the last two to three years. It has made this expensive and time consuming process completely futile and pointless. Another example of incompetent bloated government bullying.

There has been no reference to the local infrastructure and its ability to cope with this increase in population. I question whether there has been any thought whatsoever to the legal and procedural compliance in the production of these plans.

My wife and I will certainly be joining in contesting these plans which I understand where not even been presented to our local elected representatives for discussion. I am in agreement with fellow residents that this does not in any way represent the democracy I thought we lived in. These are the actions of a dictatorship that gives no recourse to the requirements or thoughts of its people.

It is not what we voted for and we will oppose this at every possible opportunity.

**Change suggested by respondent:**

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It is not what we voted for and we will oppose this at every possible opportunity.

**Legally** No**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** None

23336

Object

**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development****Respondent:** Prof Murray Gray [14544]**Summary:**

## Greater Norwich Local Plan (Regulation 19 Consultation)

## Comments of Policy 7.5

I have concerns about this policy, particularly the idea of allowing up to 3 dwellings in small parishes and 5 in larger ones on infill sites within a recognisable group of dwellings. My concerns are as follows:

1. It's not clear, within an individual parish, whether these 3/5 dwellings are to be on a single site or can be single houses on 3 separate plots. This needs to be clarified as the NPPF (Para 16(d) requires policies to be "clearly written and unambiguous".
2. It is very unclear why this policy is being introduced and it appears to be contrary to other policies in the plan. For example, the plan is about:
  - "Mitigating the effects of climate change...is a cornerstone of the plan (Para 93);
  - "Policies...will need to contribute to national targets to reduce emissions...(Para 97);
  - "...it is essential that we...assist in addressing climate change (Para 152);
  - "Growth in villages is located where there is good access to services (Table 5);
  - "Development must be designed...to reduce the need to travel" (Table 5);
  - "...reduce the need to travel particularly by private car (Table 5);
  - "...secure the highest possible share of trips made by sustainable travel (Table 5);
  - "...reduces the need to travel and provides local access to services and facilities (Table 8.1);
  - "...manage travel demand, promote active and sustainable travel (Table 8.6).
3. The NPPF states (Para 148) that "the planning system should support the transition to a low carbon future in a changing climate..." 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" (Para 150(b))
4. In recent years, many planning applications have been refused by South Norfolk Council on infill sites outside development boundaries. One of the reasons often quoted is along the following lines: "the location of the site and its remoteness from services and facilities would result in over-reliance on the private car, which will not minimise greenhouse gas emissions and is 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 would indicate 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 over the next 17 years 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 new petrol and diesel cars from 2030, older ones will still be being driven many years beyond the lifetime of the plan.
5. With over 175 parishes in South Norfolk and Broadland, the number of houses that could be constructed under Policy 7.5 exceeds 800 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 will still predominantly involve the use of the private car.
6. There is also the issue of how Policy 7.5 will 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 that 3 were given permission, say, 10 years earlier? And even if they do, will this carry much weight with the 2035 planning committee?
7. This raises the issue of precedent, and whether Members will, in future, be prepared to refuse infill dwellings in any of the hundreds of hamlets in rural South Norfolk and Broadland, and in similar locations where others have been approved. There is therefore a real prospect of the consolidation of hundreds of unsustainable hamlets within the lifetime of the plan.
8. The policy requires that proposals will "respect the character of the settlement and landscape" but this requirement should also refer to the historic heritage (Conservation Areas and Listed Buildings), flood risk areas, etc.
9. In conclusion, I believe this policy runs counter to the international, national and local policies trying to reduce the need to travel by private car and should therefore be deleted from the GNLP.

\*Policy DM3.10 states that "All development should support sustainable transport and development objectives, utilise all opportunities to integrate with local sustainable transport networks, be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to the location".

Further comments:

This is in relation to a recent refusal by South Norfolk Council's Development Management Committee on 10 March 2021 of application 2020/2335/F for Romany Gypsy Site at Yelverton.

The site was next to the A146 and immediately adjacent to a small group of dwellings and two businesses. The planning officer's report describes the site as being "well outside development boundaries, is remote from the local services and is not considered a sustainable location". The nearest primary schools were described as being 3 km away. There were no pavements or suitable footpaths from the site. The report concludes that "The site is therefore not within achievable walking or cycling distance of the main services and facilities available within the nearby villages. In that sense, it can be described as not being in an accessible location that does not comply with Policies 1 and 6 of the JCS and policies DM3.3(f) and DM3.10 of the SNLP".

The officer's report recommended refusal of the application for 2 reasons the first of which was:

"The proposal is located in the open countryside, outside a defined development boundary and is remote from local services, as such the location is not sustainable, in conflict with the aims of sustainable development; the need to minimise travel; the ability to encourage walking, cycling, use of public transport and reduce reliance on the private car. The development therefore is contrary to Policy 1 and Policy 6 of the Joint Core Strategy, policies DM3.3(f), DM3.10 of the South Norfolk Local Plan, Policy 5 of Norfolk's 3rd Local Transport Plan, entitled Connecting Norfolk; and the Planning Policy for Traveller Sites 2015".

The application was refused unanimously by the Committee. Therefore, while promoting new Policy 7.5 that will lead to sites in unsustainable locations, South Norfolk Council is, at the same time, refusing applications for sites in unsustainable locations.

I wish to appear at the inquiry in order to provide further updates on this issue.

**Change suggested by respondent:**

Delete this Policy from the Plan as it is not justified or consistent with national and local policies aimed at reducing the need to travel, particularly by private car.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23405

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Brown & Co (Miss Emma Griffiths, Planner) [19847]**Summary:**

The GNLP in its current form is not considered to be sound due to an over reliance on large scale sites within the urban area, particularly in the fringe parishes, which fails to provide the plan with sufficient flexibility to meet short term needs within the early years of the plan period. The strategy is considered to be ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period, with some of those sites having been originally allocated in previous iterations of the Local Plan.

**Change suggested by respondent:**

It is considered that additional smaller sites, providing fewer than 50 dwellings should be allocated within the urban fringe parishes in order to ensure flexibility and delivery early within the plan period in order to meet need in the area, in advance of other larger sites coming forward. Site GNLP4040 would provide the opportunity to deliver housing in the highly sustainable village of Taverham, with up to 25 low carbon dwellings rounding off development in the area, together with biodiversity and landscape benefits.

Additional information required to adequately demonstrate the deliverability of a number of proposed carried forward allocations, or their removal from the Draft Plan and the allocation of additional small sites, particularly within the urban area and fringe parishes. This would help to secure the early supply and delivery of housing and prevent reliance upon larger sites late within the plan period which may inevitably stall as experienced previously.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** 033496 Reg. 19 Representations - Roberts.pdf - <https://oc2connect.gnlp.org.uk/a/446>

23706

Object

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**Aylsham, Settlement Map****Respondent:** Patricia Grocott [19938]**Summary:**

As a resident, a member of NWT, and as a grandmother who is very worried about the very serious threats to younger generations caused by climate change, I oppose the Norwich Western Link Road.

The inclusion of this proposed road is incompatible with the climate change statement and its inclusion is therefore unsound.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23926

Object

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**Hainford and Stratton Strawless, Settlement Map****Respondent:** Hainford Parish Council (Mr J Graves, Clerk) [13286]

**Summary:**

Response from Hainford Parish Council

The proposed policy states that some smaller settlements are being clustered with those higher in the settlement hierarchy where the larger settlement provides the local primary school and where there is a safe route to school.

We consider the proposal to cluster Hainford with Stratton Strawless to be unsound for the following reasons

An assumption is being made by the planners that pupils from Stratton Strawless attend the school in Hainford which is incorrect. Catchment area is not relevant in these circumstances because :-

Out of 70 pupils currently attending Hainford School only 2 pupils are from Stratton Strawless the others preferring to attend other nearby local schools for example Horsford and Hevingham which lie on the western side of the A140 . There is no safe route for pupils to access Hainford School as this involves crossing the busy A140 and there are no footpaths to the school in Hainford from any part of Stratton Strawless. We have been informed that the larger proportion of residents living on the eastern side of the A140 are in the 55+ age group and therefore are unlikely to require access to the school..

Therefore the proposal to cluster these 2 villages based upon school catchment is unsound.

2.The statement that Hainford school has capacity to expand and is not landlocked is incorrect.

The land to the south side of the school is a private road leading to Farm dwellings and a Farming business.

The land to the north side is in private ownership and has already been discounted by the Planners as a site allocation due to long standing flooding issues.

The land immediately to the rear of the school is occupied by farm dwellings and agricultural buildings.

Therefore the judgement that the school has capacity to expand is unsound

3. Hainford does not provide services for Stratton Strawless. Both villages have their own separate village Hall and access to public transport Services, their own parish councils and function totally independently.

Therefore the proposal to cluster Hainford with Stratton Strawless for reasons of shared services is unsound.

4.The policy document states that the proposed cluster can accommodate 50 to 60 homes based upon Hainford Primary School's capacity. There is no explanation given for the relationship between number of dwellings and school places and how that calculation is made. The current extra capacity is only 17 places and there is no potential to expand the school premises.

We submit that the calculation that justifies the development of 50 to 60 homes is unsound.

5.The poor road infrastructure ,wide spread flooding and inadequate sewerage system throughout Hainford (as evidenced by the current major sewer collapse in Waterloo Rd and round the clock tankers pumping out the pumping station on Stratton Rd) would not support a significant increase in the number of dwellings in the future and therefore the suggestion that the school could be expanded to accommodate pupils from an additional 50 to 60 homes is ill considered.

Therefore we submit that this policy proposal is unsound.

6. We submit that Hainford should therefore remain as a stand-alone village with the proposal to cluster Hainford with Stratton Strawless being dropped. There is no evidence to prove that Hainford should be clustered with any other village, being wholly self-sufficient on the points being considered and unrelated to any nearby villages.

We accordingly submit that the reasoning for proposing the clustering of Hainford with Stratton Strawless is ill-considered and unsound.

**Change suggested by respondent:**

We submit that Hainford should therefore remain as a stand-alone village with the proposal to cluster Hainford with Stratton Strawless being dropped. There is no evidence to prove that Hainford should be clustered with any other village, being wholly self-sufficient on the points being considered and unrelated to any nearby villages.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24298

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Matt Hall [20061]**Agent:** Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]**Summary:**

The Local Plan is unsound as it fails to provide for sufficient growth aspirations beyond 2026 in a Main Town and allocates a site which could result in substantial harm to Grade 1 Listed buildings, when there are better alternatives; including discounted site GNLP4023, North of London Road, Wymondham

See attached

**Change suggested by respondent:**

Increase in housing delivery in Wymondham (Main Town) beyond 2026.

Deallocation of Policy GNLP0354R: Land at Johnson's Farm, Wymondham

Allocation of GNLP4023, North of London Road, Wymondham

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** GNLP4023 Wymondham Rep Lanpro - <https://oc2connect.gnlp.org.uk/a/4ff>

24299

Object

**Policy 0354R, 0354R Policy****Respondent:** Matt Hall [20061]**Agent:** Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]**Summary:**

The Local Plan is unsound as it fails to provide for sufficient growth aspirations beyond 2026 in a Main Town and allocates a site which could result in substantial harm to Grade 1 Listed buildings, when there are better alternatives; including discounted site GNLP4023, North of London Road, Wymondham

See attached

**Change suggested by respondent:**

Increase in housing delivery in Wymondham (Main Town) beyond 2026.

Deallocation of Policy GNLP0354R: Land at Johnson's Farm, Wymondham

Allocation of GNLP4023, North of London Road, Wymondham

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** GNLP4023 Wymondham Rep Lanpro - <https://oc2connect.gnlp.org.uk/a/4ff>



23341

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Mr Julian Halls [13343]**Summary:**

The requirement /suggestion to build new settlement villages has not been consulted upon in those areas or localities where the intention to provide has been identified

**Change suggested by respondent:**

Consult with the localities identified and explore other sites with a proper evaluation of all the sites identified and any new sites that might emerge.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24186

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Halsbury Homes Ltd [20028]**Agent:** Pegasus Group (Mr Robert Barber) [19984]**Petition:** 2 petitioners**Summary:**

POLICY 1- THE SUSTAINABLE GROWTH STRATEGY

Policy 1 outlines the broad strategic approach for the plan period, which includes the proposed housing requirement and housing commitments.

Housing requirement

Paragraph 65 of the National Planning Policy Framework (NPPF) requires that a housing requirement is established within a Local Plan, which shows the extent to which their identified housing need can be met over the plan period.

The foreword to the Draft Local Plan identifies a "requirement" for approximately 49,500 homes over the period 2018-38. Paragraph 177 and Table 6 of the GNLP, however, identify a housing "target" for only 40,541 homes and Policy 1 identifies a "need" for approximately 40,550 homes.

The GNLP is, therefore, not only ambiguous such that it may not be effective, it also does not accord with national policy and, therefore, would benefit from a set housing requirement in strategic policies.

Recommended modification: To provide consistent references throughout the Local Plan to the 'housing requirement' as per Paragraph 65 of the NPPF.

The minimum housing need

The need for 40,541 homes is identified as having been calculated using the standard method. The standard method provides the minimum local housing need 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<sup>1</sup>. 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 8.92 respectively. Using these figures, the minimum local housing need over the plan period equates to 41,388 homes.

<sup>1</sup> As confirmed in paragraph 15 of the Housing Delivery Test Measurement Rule Book.

Alternatively, the minimum local housing need from 2020 onwards can be calculated using the average household growth over the 10 consecutive years from 2020, namely 2020-30, with the affordability ratios of 2019 applied. The average household growth was 394, 505 and 680 respectively and the median workplace-based house price to earnings ratios were 9.01, 6.97 and 9.02 respectively. These figures produce a minimum local housing need of 2,008 homes per annum which equates to 36,148 homes over the period 2020-38. Table 6 of the GNLP identifies that 5,240 homes were completed in 2018-20. In addition to the minimum local housing need of 36,148 over the period 2020-38, this would again produce a minimum local housing need for 41,388 homes over the plan period.

It is, therefore, apparent that the standard method has been miscalculated within the GNLP and that the minimum local housing need is greater at 41,388 homes.

#### Historic under-delivery

In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 25,878 housing completions in the period 2008-20. However, only 20,924 homes have been delivered demonstrating that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa 23.7%. The overestimations of supply can be mainly attributed to the delivery rates of strategic infrastructure projects, and consequently, the ability of large scale SUE's to be delivered across Greater Norwich. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement which is 25% in excess of the minimum need for 40,541 homes. This would produce a housing requirement for 50,676 homes. Our Client welcomes the Council's decision to include a substantial buffer of over 20% between its housing requirement and housing supply. This is essential to ensure that the plan has sufficient flexibility to meet needs in full across the plan period.

#### Change suggested by respondent:

Recommended modification: In combination with the subsequent considerations, it will, therefore, be necessary to modify the emerging housing requirements.

#### Historic under-delivery

Recommended modification: It is, therefore, recommended that a proposed minimum contingency of 25% is retained as a minimum.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Dairy Farm, Thorpe End - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4b4>  
GNLP - Reg 19 Reps - Dairy Farm, Thorpe End - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b5>

## 24187

## Object

### Policy 5 Homes, Policy 5 Homes

**Respondent:** Halsbury Homes Ltd [20028]  
**Agent:** Pegasus Group (Mr Robert Barber) [19984]  
**Petition:** 2 petitioners

#### Summary:

POLICY 5 – HOMES

Policy 5 of the GNLP Draft Strategy sets out a requirement of 33% affordable housing on sites of 10 or more units, despite the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) identifying that there was a need for 39,486 homes, of which 28% or 11,030 homes represent affordable housing. The affordable requirement, should be based on up to date

evidence and should be subject to detailed viability testing under a range of scenarios. It is, therefore, considered that this aspect of Policy 5 will need to be amended.

#### Change suggested by respondent:

Recommendation: In order to address this, it will be necessary to either recalculate the affordable housing needs based on the planned supply and then set affordable housing policies accordingly, or to reduce the affordable housing requirement within Policy 5 to 28%.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Dairy Farm, Thorpe End - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4b4>  
GNLP - Reg 19 Reps - Dairy Farm, Thorpe End - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b5>

## 24188

## Object

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Halsbury Homes Ltd [20028]  
**Agent:** Pegasus Group (Mr Robert Barber) [19984]  
**Petition:** 2 petitioners

#### Summary:

POLICY 7.1 – NORWICH URBAN AREA INCLUDING THE FRINGE PARISHES

The Draft GNLP Strategy states that the Norwich urban area including the fringe parishes<sup>2</sup> will deliver 32,691 homes over the plan period (approximately 66% of the proposed housing growth). The site at Dairy Farm would, therefore, be a valuable contribution to this target which owing to the size of the site and the fact that our Client already owns the land would be deliverable within the first 5 years of the plan period, hence also contributing to the Councils five year housing

land supply.

Land at Dairy Farm falls within the Thorpe St Andrew Growth Triangle an area identified for major growth. Situated in between the villages of Thorpe End and Rackheath the land at Dairy Farm would benefit from access to their village services as well as those within the Norwich urban area. Furthermore, there are an array of existing employment centres within the vicinity as well as a number proposed. Thereby the allocation of the small-scale housing site of Land at Dairy Farm would be in a sustainable location and would assist in providing the Councils' with greater certainty over housing delivery during the next plan period.

The Village Cluster – Broadland Assessment Booklet for Great and Little Plumstead within the GNLP's evidence base assesses submitted sites in these parishes for consideration in the GNLP. It states that the Site at Dairy Farm (ref: GNLP4030) is a "well located urban fringe site, with easy access onto the NDR" but following a Sustainability Appraisal (SA) it has not been proposed for allocation principally because it is considered that there is currently not a need for a development of that scale and there are other better urban fringe sites. Other concerns listed are set out in the paragraphs below:

#### Accessibility

The Great and Little Plumstead Assessment Booklet highlights concerns over the accessibility of existing services and facilities by walking or cycling to either Rackheath or Sprowston. The assessment does, however, go on to acknowledge that with development of the scale proposed at land at Dairy Farm (up to 1200 homes) that services and facilities as well as highway and

2 The Norwich fringe is the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St Andrew and Trowse and the remainder of the Growth Triangle.

pedestrian improvements would be secured through the planning process. Indeed, as stated in our Client's Regulation 18 Representations there is the potential to deliver new community facilities at Land at Dairy Farm for a range of uses, including public open space. Halsbury Homes Ltd will explore further whether it may be possible to deliver some of these facilities at the Site and they would welcome the opportunity to engage with the local community to understand what kind of facility will be of greatest benefit to them. There is also the potential for off-site contributions to upgrade existing facilities. The settlements of Thorpe End and Rackheath in between which the site is located possess a range of facilities and services including a post office, village store, church, primary school and village hall.

In addition, as part of the Growth Triangle Area Action Plan (APP) proposals, there are enhancements planned for the local transport infrastructure. These include improving bus routes, and in particular, Bus Rapid Transit Corridors for which routes have been safeguarded, increasing the accessibility to the City centre. The Norwich Cycle Network is also proposed to be extended to serve the allocated sites north of the NNDR. As stated in the AAP "The new transport links, services and facilities delivered through the coordinated development of the Growth Triangle will support existing and new communities." The adopted Broadland JCS (2014) establishes an effective implementation framework which will deliver this infrastructure in a timely manner. Hence, residential development located within this growth triangle will be supported by a multitude of infrastructure improvements that are proposed specifically to support such growth. It is, therefore, considered that services and facilities would be easily accessible from the Site via walking, cycling and other sustainable transport modes.

#### Landscape and Townscape

Comments surrounding the potential impact of the development on the landscape and townscape were raised in the site Assessment, owing to the Site's size but also its proximity to the Thorpe End Garden Village Conservation Area which abuts the south western corner. Any future planning application would be supported by a Heritage Assessment as well as a Landscape and Visual Impact Assessment which would inform the proposed layout. It is possible for development to be set back from the south western edge and separated by public open space and sensitive landscaping to ensure that

there are not any adverse effects on the setting of the Conservation Area. The use of perimeter landscaping would also be explored to soften the views of development.

In addition, it is considered that the existing built form of Thorpe End to the South, the consented development to the north (Land at Green Lane East, Rackheath – ref: 20200202) as well as the presence of transport infrastructure which transects the Site (NNDR, Broad Lane road and the Norwich to Sheringham railway line), have already had an urbanising impact upon the area reducing the value of the site as ‘open countryside.’

#### Biodiversity

Other comments raised relate to concerns over whether net biodiversity gain can be achieved through the development of the Site in line with National and Local policy. Our Client would ensure that any scheme on their Dairy Farm 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. They would also ensure that a green corridor would be maintained to the east of the site and again through sensitive design and positive enhancements would improve the ecological value of the site which in its present agricultural use is limited. Any future planning application would be accompanied by Ecological and Arboricultural Assessments to support the proposals.

#### Existing Buildings

Concerns were highlighted over the removal of existing agricultural buildings. A survey would be conducted to assess their current condition in the usual way. They are, however, in most other respects not appropriate for modern farming methods.

#### Noise

The Assessment notes concern over the impact of noise from the NNDR on potential residential development. A Noise Survey would be conducted to establish the potential effect of the NNDR and other surrounding transport infrastructure including Plumstead Road / Broad Lane and the Norwich to Sheringham railway line. The results of which would identify the requirement for potential noise mitigation measures which would then inform any potential scheme layout. Indeed, the aforementioned application at Land at Green Lane East, Little Plumstead (ref:20200202) which is subject to the same noise constraints was supported by a Noise Assessment which concluded that levels of noise recorded would not require any additional attenuation over and above standard building specifications.

#### Flooding

The Great and Little Plumstead Booklet notes that the Site is located within Flood Zone 1 in its entirety but identifies two main areas at risk of surface water flooding. Whilst the Booklet goes on to confirm that these would not be severe enough to prevent development, it states that they would require further consideration. Our Client would ensure that a Flood Risk Assessment would be submitted in support of any future planning application for the site which would be used to inform the subsequent drainage strategy and scheme layout.

#### Conclusion

The Great and Little Plumstead Assessment Booklet concludes that whilst the Site is not currently proposed for allocation “it may be more difficult to resist development there in the future if additional housing growth is needed.” As demonstrated by the response provided in

these representations, it is considered that the allocation of additional sustainable sites, which are available and deliverable, like Land at Dairy Farm, is required to provide greater security over the plan period.

#### Change suggested by respondent:

Recommendation: In order to provide greater certainty for the plan period it is considered that additional sites in sustainable locations which are capable of delivering housing growth within the plan period should be allocated; providing the opportunity to allocate Land at Dairy Farm, Thorpe End.

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Appear exam: Written Representation

Attachments: Dairy Farm, Thorpe End - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4b4>

GNLP - Reg 19 Repls - Dairy Farm, Thorpe End - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b5>

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**23551****Object**

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**Aylsham, 4.4**

Respondent: Mr Paul Hancock [19900]

**Summary:**

The plan is not positively prepared or justified in respect of allocating two sites and 550 homes without consideration of the infrastructure needs of the town, which are under strain from two recent developments of 550 new homes. To have one site under Reg.18 would have created problems, to have two sites magnifies the issue of infrastructure. There are problems of water supply and sewage disposal, the road network through the town will not cope with the extra traffic generated, the health and social care system and the education system will not cope with a population increase of 20%.

**Change suggested by respondent:**

The second site in Aylsham under regulation 19 should be withdrawn immediately due to no consultation with the residents

Legally No

compliant:

Sound: No

Comply with No

duty:

Appear exam: Written Representation

Attachments: None

23297

Object

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**Policy 0605, 0605 Map****Respondent:** Mrs Gill Hannant [19116]**Summary:**

At present stringers lane and Aubrey rix access roads are not accessible to volume of traffic proposed. Two cars can only pass each other if there are no cars parked and use the footpath to pass. The footpath is not in full so dangerous. Many houses are made up of families with children and the increased volume of cars will be unsafe

**Change suggested by respondent:**

A road to be built behind the proposed development land which doesn't use stringers lane or Aubrey rix

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23458

Object

**Aylsham, 4.5****Respondent:** Ms Lynda Hartley [19874]**Summary:**

Section 33A of PCPA requires LPA to engage with other bodies over strategic matters and give evidence as such. However, there was no information given to the Town Council of Aylsham and thus to the inhabitants of Aylsham of the increase in the number of houses to be built as part of GNLP. The numbers have been moved upwards without consultation of either of the parties resulting in three sites rather than one. This on top of the existing sites which one already placing a strain on the town.

**Change suggested by respondent:**

The area's needs have not been objectively assessed with regard to planning of the town in terms of extra traffic, lack of employment, schools, doctors, sewerage, pollution, environmental soundness. The presentation of the historic nature of the town and its community spirit which were mentioned rings hollow. It gives rise to the opposite in effect - the development of a dormitory for Norwich.

There is no mention of the effects of coronavirus or Brexit. Both these issues which will alter and have altered the way we live and work cannot be put on one side. Without them the policy is unsound. An evaluation of the number of homes to be built in a time of economic distress cannot hold merit.

The developments should be put on hold until a correct assessment of their need is available and whether they are financially practical.

There should be full consultation whether the plan is delivered and appropriate and whether it is acceptable to the Town Council and the inhabitants of Aylsham.

An alternative strategy of examining the use of existing building within Norwich to become dwellings and where employment would be readily available plus all the amenities should be considered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23912

Support

**Poringland, Settlement Map****Respondent:** Mr Alan Harvey [18641]**Summary:**

Support GNLP2111 and GNLP2124 has not been allocated as Poringland cannot take any more additional houses.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23694

Object

**Aylsham, Settlement Map****Respondent:** Jean Hawke [19935]**Summary:**

I am writing to point out the illegality and unsoundness of the plan to develop a second site in Aylsham under reg19 of the draft involving 250 more houses there. I also object to the building of 300 houses in reg 18 in the first place, but I believe that this may have slipped through. It is regrettable that the proposals were not put before Aylsham town council and Broadland for consultation first. I also hope it will not force the TC into taking legal action.

As a long term resident of Aylsham since 1956 (65 years) I think that both these proposals, especially reg 19 will be the end of Aylsham as

“the jewel in Broadland’s crown as said by Barbara Hornbrook some years ago

The GNLP blueprint is riding roughshod over Aylsham as a market town, and its scattergun proposals on where to build are town planning vandalism. Just because 2 plots seem to be available it is a BAD IDEA

to go ahead willy nilly and build on them, not realizing the potential damage to the Town they will be sure to cause.

Maybe this is the Norwich tunnel vision view point. Those producing the GNLP have not considered the strains already placed on the infrastructure caused by the recent building of the Willow Park and Bure Meadows estates (550 houses then)

Let alone the probable of a further 550 homes( maybe 2000 more people)

There MUST be more to planning than just putting up houses. Builders will be cheering. But the quality of life here will decline and Aylsham will become just a dormitory town for Norwich, lose its citta slow status and its reputation as a nice place to live. Pressures on the infrastructure: water, drainage, sewage, doctors surgeries, school places, wear and tear on roads, traffic and parking. The town is congested enough now without another 2000 people and their cars. There will probably be a call for another supermarket which will adversely affect the local shops.

Finally, I have suggested in the past, that new small hamlets could be built individually or in addition to already declining villages. These could have a market square, a community hall, recreation area and shops built into the design. They could be distinct villages and not tacked on to the edges of distinctive Market towns like Aylsham. Just tacking more houses on to the edges of Market Towns is a lazy and unimaginative way of town and country planning

**Change suggested by respondent:**

-

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

24308

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Mr Richard Hawker [13393]**Summary:**

I know that others have submitted very well-argued and detailed responses to the GNLP, viz. Bryan Robinson and Andrew Boswell. From reading them, and the GNLP documents, it seems that there are many aspects of planning which the GNLP has not addressed, or addressed incorrectly.

- 1) The latest plan has taken into account projected housing need figures produced in 2018, whereas it is stated clearly that those from 2014 should have been used.
- 2) The 2018 figures are higher, and do not take into account the already-stated 'windfall' house numbers which inevitably arise.
- 3) This is made worse by the fact that the later figures do not adequately reflect the fact that Britain has left the EU, and immigration figures are reducing. It simply does not make sense to plan to build houses which are unlikely to be lived in. Even now, there are plenty of permissions for houses which have not been taken up. These surely should be used before looking to increase dramatically the numbers of extra houses planned to be built.
- 4) The development of the area should be about more than simply building dwellings. Norfolk should be preserving its precious countryside, not planning to put it under bricks and
- 5) The numbers in the new proposals are not justified, and thus not consistent with the NPPF. It is doubtful whether the numbers proposed could ever be served adequately by local services as they stand. Also, the plans are not sustainable, in that they will negatively affect the freedom future generations will have to determine the development of the area.
- 6) Following the COVID pandemic, the whole plan should be looked at afresh, bearing in mind changed working practices. Transport, in particular, needs to be assessed now that the rush-hours appear to be less 'peaky' and the government's stated aim of bringing about a modal shift to greener forms, mainly public transport, should mean that new and upgraded big roads are removed from the plan.

Please think again about making such a huge change to our rural county. We need a reasonable-length time of stability, consolidation and improvement of what we have.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23615

Object

**Housing, 54****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

If Care Home bed spaces can also now be counted against housing need at a suitable discounted rate then why are they not included as are the new purpose-built student accommodation rates?

**Change suggested by respondent:**

Need to ensure compatibility with all measures and include both student accommodation and care homes as permitted.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23600

Object

**What is the Local Plan?, 1****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

If the consultation also includes the Norfolk Broads Authority then it should also include North Norfolk District Council views. An example would be the Wroxham/Hoveton community which border BDC and North Norfolk districts. The community share a primary care centre at Hoveton which serves residents of Salhouse, Wroxham, Rackheath and other smaller communities. It also shares the a major shopping and recreational hub, railway line and other public transport links. It seems odd that a decision made here could be undermined by a decision made by North Norfolk District Council or the Hoveton Neighbourhood Plan if there is no consultation.

**Change suggested by respondent:**

I would like to see how this plan integrates with the rest of the county which consists of other district councils and there needs to be some links particularly for shared infrastructure. There should also be some acknowledgement of the joint strategic collaboration between BDC and South Norfolk Council and thier joint management teams. There is also no mention in this introduction of the numerous neighbourhood plans undertaken at great cost and by a lot of hard work by volunteers.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23602

Object

**What is the Local Plan?, 3****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

The plan runs from 2018 to 2038 and admits that these are rapidly changing times. This includes the impact of a post Covid 19 and Brexit environment as well as potential changes in central government with at least 4 general elections to have occurred during this time.

**Change suggested by respondent:**

There should a statement in the introduction on how the plan is going to be continually reviewed and adapted to cope with these rapidly changing times. Plans made now could have very little positive impact in 20 years time particularly with the need to reduce carbon footprints and already county wide illegal vehicle emissions. It seems odd that the Tomorrow's Norfolk, Today's Challenge strategy includes all Norfolk councils yet this growth strategy does not. At the very least there should be links to the other growth strategies in this introduction so at least residents can access them to see the linkages.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23603

Object

**What is the Local Plan?, 4****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

If this plan is to be superseded by 2025 (Whatever the content of the final transitional arrangements and the timing of the adoption of the GNLP, it is thus very likely to be superseded within a few years of adoption) then why bother now. Surely an interim plan would have sufficed in the short term to take us over the next 5 years whilst working on the new plan later?

**Change suggested by respondent:**

I would assume that all GNP member councils would have made some representation to the "Planning for the Future" White Paper and if so then I would like to see links to those representations to see what the individual councils actually stated or was it the GNP that made one representation on thier behalf?

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23607

Object

**Setting the scene - a vibrant place to live and work, 8****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

The long term view is a challenge as well informed pundits have declared 2020 to 2030 as a "Decade in a Century" ie there will be as much change in this decade than in the last century. We have already seen during the Covid 19 pandemic a huge change in peoples behaviours and attitudes particularly among the millennials who will be the generation most impacted by these plans.

**Change suggested by respondent:**

I would like to see how these plans are future proofed with the expected pace of change outstripping anything seen in the past. Thinks like home working facilities, drone landing capabilities, driverless cars etc.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23610

Object

**Setting the scene - a vibrant place to live and work, 7****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

Interesting use of the term dynamic villages as these plans for large developments on the edge of Norwich City ie an enlarged Norwich footprint do nothing to improve existing villages. Indeed the exact opposite as existing villages and towns are calling up for inward investment to maintain the dynamism. Local village communities are dying as local shops, post offices and schools close as the younger generation move out to large edge of town developments. To ensure rural communities thrive they need a varied supply of housing. ACRE supports appropriate development in rural areas, especially the provision of affordable housing.

**Change suggested by respondent:**

I would like to see how these plans cater for a dynamic village. My village has lost both its Pub and Post Office in the last two years as locals have no affordable housing or employment that allows them to remain in thier village many of who were born in the village.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23611

Object

**Setting the scene - a vibrant place to live and work, 9****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

The original Joint Core Strategy (JCS) was found to be unlawful in 2012 due to the absence of a legally required Strategic Environmental Assessment. Mr Justice Ousley was critical of the methodology used in the development of the original JCS and compared it as "wading through treacle".

**Change suggested by respondent:**

I would like to see an acknowledgement of this court finding in the introduction and some admission that lessons learnt from the legacy JCS have been learnt in this Plan.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Heard v Broadlands DC 24.2.12.pdf - <https://oc2connect.gnlp.org.uk/a/45d>

23612

Object

**Planning to Our Strengths, 10****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

The Cambridge Norwich Tech Corridor links universities in Cambridge and Norwich, with research institutes and science parks such as the Wellcome Genome Campus, Babraham Research Campus, Hethel Innovation Centre and Norwich Research Park. These are all located in the south and south west boundaries of Norwich whereas the planned houses are in the North East Growth triangle. I see no correlation between this planned housing and the increased employment opportunities in the tech corridor.

**Change suggested by respondent:**

I would like to see how the large number of homes planned for the growth actually link to the employment hot spots in the Tech Corridor and particularly how the rare public transport links are between the the two opposite ends of Norwich city.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23613

Object

**Planning to Our Strengths, 11****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

What are the environmental assets mentioned here?

**Change suggested by respondent:**

I would like the plan to list these environmental assets and how they are measured as an environmental asset. The System of Environmental-Economic Accounting (SEEA) Chapter 5 (Asset Account) defines environmental assets as "the naturally occurring living and non-living components of the Earth, together comprising the biophysical environment, that are used in production and that deliver ecosystem services to the benefit of current and future generations".

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23618

Object

**Appendices, Appendix 4 Plans to be superseded and Plans to be carried forward****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

I fail to see the relevance of Neighbourhood Plans which continually seem to be ignored or overruled. A classic example is the Land at Green Lane East, Little Plumstead for the development of up to 130 market and affordable dwellings, a 92 bed extra care independent living facility (use class C3) and a medical centre (use class D1) with all matters reserved except for access (Outline). Broadland District Council Planning Application ref : 20200202. This is not in th plans for Plump stead or Rackheath.

**Change suggested by respondent:**

There needs to be an explanation of those plans that have been submitted and approved that fall OUTSIDE of the Neighbourhood Plans. These plans were an expensive exercise and took up a lot of time of willing volunteers only to see them being ignored.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:**

23876

Object

**Population, Table 1 Population of the largest settlements in Greater Norwich****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

It is a little misleading to ignore the population of Salhouse whilst including Wroxham. Salhouse sits between Rackheath and Wroxham and although outside of the growth area it will nevertheless be impacted by these plans and the urban sprawl eastwards. The Salhouse population is estimated to be 1,016 and they use the same infrastructure and facilities as the residents in the growth area. Indeed the plans for Rackheath North and development centred on the old Rackheath airfield, dissected by Muck Lane, abuts right up to the Station Road conurbation that was once part of Rackheath but is now in Salhouse.

**Change suggested by respondent:**

I would like this plan to be more transparent and acknowledge the impact these plans will have on those communities that may sit outside of the designated growth area but are still reliant on the same services and infrastructure.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23880

Object

**Health and Welbeing, 45****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

I find this plan not sound as it does not refer, in this Health and Wellbeing section to the Norfolk Joint Strategic Needs Assessment (JSNA) which is the standard tool when predicting future health needs and trends in order to inform on housing and other factors.

**Change suggested by respondent:**

I would like to see a cross referencing to the Norfolk Joint Strategic Needs Assessment (JSNA) and in particular the views of Healthwatch.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None



23870

Object

**The GNL and other local plan documents, 26****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

The village of Rackheath is part of BDC "growth triangle". In 2009 it was identified as one of a dozen proposed sites to create new carbon-neutral eco-communities. The government subsequently withdrew this particular programme, but in 2016 a new Masterplan was published. The interested parties consisted of Manor Farm, Barratt Homes and BDC. Core features of the development included up to 4000 new homes, three new schools, an employment area, waste recycling, recreation grounds and a health and social care facility. We believe that the interested parties are no longer interested making this element of the planned housing supply redundant.

**Change suggested by respondent:**

We would like to see any revised plans for this strategically important site and the allocation of 4,000 new homes including the 1320 affordable homes . If this development is now under threat where are these house going to be built? North Rackheath is one of the largest allocations for development in the current local plan and it has been stalled for around 10 years as it hasn't been financially viable for the developers to commit to developing the site. BDC policy includes a target for 33pc affordable housing but also states that the proportion of affordable housing sought may be reduced where it is shown through a viability study that this target cannot be met.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23885

Object

**Health and Welbeing, 46****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

The post Covid NHS will look very different from now and when these plans were developed. The integration across both health and social services plus the increasing dependency on the voluntary sector. The plans for Primary Care Networks are particularly relevant for these plans as the primary care environment divides into localities with the Norwich and North Norfolk localities mostly impacted with these plans. I'm not convinced that the planned health facilities will be funded correctly.

**Change suggested by respondent:**

I would like to see a link to the Norfolk and Waveney Health Care Partnership and thier plans, with an aging population, to sustain thier Enhanced Health in Care Homes programme.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Briefing - Norfolk Primary Care Networks.pdf.docx - <https://oc2connect.gnlp.org.uk/a/46q>

23897

Object

**Education and Social Mobility, 75****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

This plan states that the GNLP will need to make provision for additional schools and school places to serve growth and then is silent on the plans to achieve this. The questionable Rackheath North development has included plans for one new secondary school and two new primary schools. If this development does not go ahead or is changed significantly then where will these schools be located. The current school in Rackheath is over subscribed.

**Change suggested by respondent:**

There needs to be a plan as to where and when these new schools and further educational establishments will be built and who will fund them.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23902

Object

**The Rail Network, 84****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

These plan are silent on the London in 90 initiative and the impact this could have on the inward movement of people to Norwich who may wish to commute into London on a regular basis thus increasing pressures on local roads and car parking in and around Norwich mainline station. The Bittern line does not always stop at Salhouse and the original growth plans included a new rail halt at Rackheath which doesn't seem to get a mention here.

**Change suggested by respondent:**

I would like to see the modelling on the impact the proposed London to 90 programme will have on the housing needs and where the plans for the growth on the Bittern Line including any new stations/halts is factored in.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23906

Object

**Emissions and Climate Change, 97****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

BDC commissioned the exemplar houses in Trinity Close, Rackheath which were designed to the highest sustainability level. They have however proved to be an economic disaster with the extra greening increasing the average build cost considerably. In addition local residents complained of excessive heat in the summer, issues with air source heat pumps and the failure of grey water flushing.

**Change suggested by respondent:**

I would like to see what lessons learnt have been applied to from these exemplar homes and how planners are going to insist of carbon neutral housing whilst still delivering an economical model making it attractive to developers.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23908

Object

**Flood Risk, 98****Respondent:** Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]**Summary:**

I see no mention of the use of sustainable drainage systems (SuDS) to provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses. Local landowners and farmers are concerned about the water stress that large developments will cause as they struggle to provide water for thier agricultural crops in competition with homeowner domestic needs.

**Change suggested by respondent:**

Local residents in the North East Growth area will know that the current flooding causes chaos after a period of heavy rain as the natural environment continues to be covered in tarmac prevent natural drainage and causing sever rain water run off. I would like to see some acknowledgement of this and confirmation of the use of SuDS in these plans. I would also like to see some affirmation fro the NFU, or another similar professional body, that the needs for farmers have been taken into consideration.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

24486

Object

**Intro, 1.3****Respondent:** Heartland PACT Ltd [20073]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]**Summary:**

The GNLP in paragraph 1.3 states that South Norfolk villages are being prepared separately and are therefore not integral to the GNLP. As such, in accordance with paragraph 35 of the NPPF, the proposed strategy for South Norfolk, Broadland, and Norwich City is not positively prepared (how can the policy adequately address an objectively identified need if there is a third of the strategy is withheld?) and is not effective (the policy clearly states that strategic matters should be addressed rather than deferred). As such, the GNLP is found to be unsound in its current form omitting a substantial part of the allocations for future development within a third of the administered area and in direct conflict with paragraph 35 of the NPPF.

**Change suggested by respondent:**

The GNLP should include all potential allocations within its administrative boundary, ensure a comprehensive strategy for growth is applied, and that all three areas are adequately provided for. This is also crucial when considering other policies, such as Policy 7.5 which refers to windfall schemes as without knowing where growth is planned in South Norfolk, there is an unacceptable reliance on all development and growth to be supplied by schemes of 3 to 5 dwellings in the absence of allocations.

Specifically, the GNLP, if the existing windfall policy is adopted as is, would require a substantial amount of allocated development to ensure rural communities and businesses remain viable. Taking Dickleburgh for example, this is a sustainable location, with local amenities and facilities, however following Covid-19 and the shut down of businesses, a larger development of more than 5 dwellings would be expected to truly support the settlement, allowing it to capitalise and thrive on new patrons and neighbours. GNLP2145 was submitted to this effect, providing a wealth of new community open space, as well as much needed housing for all ages. Such a development adheres and infills the settlement, whilst supplementing the viability of local businesses which are necessary to preserve the sustainable nature of Dickleburgh.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

24487

Object

**Homes, 136****Respondent:** Heartland PACT Ltd [20073]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]**Summary:**

The GNLP proposes an unjustified strategy that is not positively prepared, conflicting with its aspirations in paragraph 136; "Our suburbs, market towns and villages will also be vibrant places to live with good access to services and facilities, supported by new housing and jobs and changing technologies. Homes here will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities." The NPPF states in paragraph 78 that "housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." The GNLP does not propose a policy that supports this, instead proposing an allocation only approach, and exceptionally limited windfall proposals through policy 7.5 the GNLP. This approach is not consistent with national policy and directly restricts and impedes upon local rural economies which require new development, and new residents to expand and thrive. Given the GNLP does not identify opportunities or provide significant policy to support village and rural community growth in a meaningful manner, it is considered the GNLP actively restricts this, in conflict with paragraph 78 of the NPPF. As such the GNLP is not consistent with national policy and is in conflict with of paragraph 35 of the NPPF and proposes an unjustified strategy that does not provide an adequate strategy to ensure rural viability.

**Change suggested by respondent:**

It is considered to make the plan sound that a dedicated policy to provide clarity and instruction on rural growth and development is needed. A policy which goes further than policy 7.5 and truly addresses the aspirations of paragraph 136 where all settlements will be supported by new housing and jobs. Such a policy can support windfall proposals, or allow for limited development, but in either case, would supplement the existing rural economies, facilitating growth. It is considered that growth of more than 5 dwellings, which would require affordable housing contributions, should be allowed.

For example, taking the village of Dickleburgh, out of the allocations that have been proposed at Regulation 18, GNLP2145 would be an ideal proposal. Such a development would ensure a good proportion of growth is available (which could be phased to be spread out over a period of time) which would supplement the existing local facilities in a more substantial way than ad hoc development of 3 to 5 dwellings. Such a development would aid in not only creating a more sustainable settlement, where new business may be attracted, but also secure the existing facilities with a wider customer base, especially in light of the recent economic challenges national lockdowns have created.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

24488

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Heartland PACT Ltd [20073]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Policy 7.5 is considered to be unjustified and inconsistent with national policy. Within the Delivery Statement for housing, the Regulation 19 GNLP states that "Additional opportunities will be provided, particularly for small scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development." These additional opportunities are proposed through policy 7.5 of the GNLP. However Policy 7.5 does not provide any significant support for meaningful development. It is considered that the proposed limiting of development to 3 or 5 dwellings would not contribute affordable housing, public open space, or other benefits and would impede settlement viabilities, restricting necessary growth necessary to support existing services and facilities. As such, there is an inherent contradiction within the GNLP regarding the aspirations for the support for village growth, and the actual policies restricting growth. This also conflicts with the NPPF in paragraph 78 which supports rural vitality resulting in the policy being inconsistent with national policy. As such the proposed policies are not considered to be justified, effective, and is inconsistent with national policies.

### Change suggested by respondent:

The conflict highlighted between the delivery statement and the housing policy (Policy 7.5) risks undermining the delivery of needed sustainable development. Instead, a clear policy should be provided for that outlines what is considered acceptable for windfall schemes, especially sites for larger sustainable settlements that would be defined as villages but housing 2500+ residents. This policy should address volume/density of development, as well as how it should relate to existing settlements or be allowed in sustainable locations in meaningful quantities to support rural economies.

Furthermore, if the policy is not addressed to facilitate meaningful growth, then housing allocations should be proposed to enable growth beyond the settlement boundaries in a way that supports the local economy. Additionally, clarity must be provided regarding what constitutes small scale growth. For example, looking at proposed allocation GNLP2145, we can see that growth is proposed in a way that compliments the settlements existing size, whilst infilling an edge of village location up to the highway network of the A140. This would result in a complimentary development, bringing a wealth of public benefits, as well as ensuring the vitality of Dickleburgh by allowing a sustainable settlement to expand to support itself.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23688

Object

## Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]

### Summary:

Hempnall Parish Council considers that the Housing Growth Needs as set out in paragraphs 176 to 187 of the Draft GNLP Regulation 19 Publication (under Policy 1 – The Sustainable Growth Strategy in Section 5 of the document 'The Strategy') are unsound (and possibly not legally compliant) both in regard to the magnitude of the Total Housing Potential and in respect of the spatial distribution of development.

In particular we consider that both the total number of houses (Total Housing Potential) and the distribution of development conflict with Climate Change objectives and potentially contradict objectives set in regard to environmental protection and enhancement including protection of the landscape.

Relevant NPPF paragraphs and Climate Change Act targets relating to concerns over the magnitude of the Total Housing Potential

The NPPF requires that: "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures" – paragraph 149

The Oxford English dictionary defines mitigating as: "having the effect of making something bad less severe, serious, or painful." Therefore the NPPF says that local plans should take a proactive approach in making something bad (i.e. climate change) less severe, serious or painful.

NPPF paragraph 148 states that the planning system: "should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions"

Climate Change Act 2008 has set a legally binding target for the UK to reduce its Greenhouse Gas emissions from 1990 levels by at least 80% by 2050.

The Climate Change Act 2008 (2050 Target Amendment) Order 2019

The UK has recently legislated to end its contribution to global warming by 2050, with a target that will require the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

Given that the carbon foot print resulting from the pre-construction and construction work necessary to build each new house is in the region of 100 tonnes of CO<sub>2</sub> \* then fulfilling the Total Housing Potential of 49,492 houses could generate 4,949,200 tonnes of CO<sub>2</sub> and this is just the amount of CO<sub>2</sub> resulting from building the houses. If the operational greenhouse gas emissions over the lifecycle of the properties is factored in the emissions total leaps to astronomical levels as the building phase is only responsible for about a quarter of total lifecycle emissions. Of course building methods could improve during the plan period, thus reducing both construction and operational emissions, but with the government constantly "kicking the can" down the road on introducing stricter building regulations this may well take many years to be realised and even with better standards total emissions resulting from the building and operation of 49,492 additional houses will still be very high.

There is a choice that can be made between retaining the policy draft figure of 49,492 or setting a lower total housing number in accordance with NPPF paragraph 60 which says that: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach"

Hempnall Parish Council contends that adherence to climate change policy should require local authorities to choose the minimum number of houses needed in order to comply with the local housing need assessment resulting from the appliance of the standard method in national planning guidance and to not set a housing target or housing potential at a higher level.

Therefore Hempnall Parish Council considers that the GNLP should reduce the Total Housing Potential to the level required to address local housing need as assessed by the standard method i.e. 40,541 dwellings as it is unsound to proceed with a Total Housing Potential for 49,492 extra houses by 2038 because the higher figure is not compatible with

## Government Climate Change Objectives.

In making a choice to proceed with the lower housing figure the GNLP would be demonstrating that:

- The plan has taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because it will have chosen the least damaging option in terms of greenhouse gas emissions (the huge CO2 emissions that would have resulted from building nearly 50,000 houses would be made less severe or serious) while still complying with NPPF paragraph 60. Of course the construction and operation of 40,541 houses will still generate enormous greenhouse gas emissions but the total will at least be around 20% less than if 49,492 were built.
- The plan has attempted to comply with NPPF paragraph 148, as best possible given the requirements of NPPF paragraph 60, by endeavouring to “shape places in ways that contribute to radical reductions in greenhouse gas emissions”. While choosing to build 40,541 extra houses is not going to lead to a radical reduction in greenhouse gas emissions making this choice radically lowers emission levels below those which would occur if 49,492 houses were built.
- The plan has attempted to comply, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050.

If the choice is made for the GNLP to proceed with the higher housing potential figure of 49,492 the plan will not have demonstrated that it has:

- Pursued a proactive approach to mitigate climate change impacts because it will have chosen an option that makes something bad (i.e. climate change) more severe and serious than it otherwise would have been if the lower local housing need figure was chosen. The plan would not be compliant with NPPF paragraph 149.
- Attempted to comply with NPPF paragraph 148 because it will have chosen not to take advantage of the opportunity to achieve the radically lower emission levels that would result from the adoption of the lower local housing need figure
- Complied, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050 because in not choosing the lower local housing need figure it will have facilitated the generation of considerably higher level of greenhouse gas emissions.

\*(source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire - this is 3000 home development. If you look to page 15, it says: “The total GHG emissions from pre-construction and construction are estimated to be in the order of 313,370 tCO2e” i.e. around 100 tonnes per house)

Furthermore Hempnall Parish Council considers that the GNLP should reduce the Total Housing Potential to the level required to address local housing need in order to provide a greater level of environmental and landscape protection

Clearly the land take to build 49,492 houses is considerably greater than that required to construct 40,541. Choosing the lower figure saves many Greenfields from the threat of development and in so doing makes it easier to protect countryside, habitats, landscape, flora and fauna.



## Hempnall Parish Council's concerns over the distribution of Housing

Allocating new sites in villages as part of a dispersal policy is unsound as it conflicts with the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Concentrating development in and around Norwich is the best way to reduce greenhouse gas emissions as such development can more easily be based on the usage of public transport. There is increasing potential for more residential space to be provided in Norwich as a result of trends towards home working and internet shopping which are leading to a reduction in the need for office and retail space in the city centre.

Vehicle use is often the main contributor to operational emissions resulting from new housing \* \*. Therefore development that is dispersed will create a greater level of greenhouse gas emissions than development that is concentrated in or close to Norwich. Eventually private cars will all be electric or hydrogen powered but for the "shelf life" of the GNLP (to 2038) the transition will not have been completed and for the first 12 years (and probably more) of the plan the majority of vehicles will remain as petrol or diesel powered.

The table on page 80 of the GNLP papers from June 23rd, 2017 clearly showed that the best spatial option for new housing in order to minimise negative environmental consequences was Option 1: Urban Concentration close to Norwich. This option was the one which was best for: minimising, air, light and noise pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing bio-diversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; reducing the need to travel and promoting the use of sustainable transport modes; minimising the use of the best agricultural land and maintaining and enhancing water quality and its efficient use. In terms of all these and other factors taken together the least desirable option was Option 4: Dispersal of Development.

Unfortunately the obvious conclusion that should have followed on from the publication of this table, i.e. for the GNLP to be based on Option 1, was not pursued. Instead the distribution pattern for new housing envisaged in the draft plan, while it includes a degree of urban concentration, still promotes dispersal of development through proposals to make new allocations in Village Clusters and via policy 7.5. These allocations are in addition to the rural housing sites already included in current commitments carried over from the JCS and are additional to estimates for windfall developments in villages.

If the GNLP proposals for the location of new housing are not changed a sizeable chunk of development will end up being dispersed and the plan will not have:

- Taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because the plan would be facilitating a distribution pattern of development that produces greater greenhouse gas emissions than would be the case if a better option (Option 1) had been chosen
- Complied with NPPF paragraph 148 which seeks to "shape places in ways that contribute to radical reductions in greenhouse gas emissions" because it clearly does not shape the development of places in a way that enables there to be a radical reduction in greenhouse gas emissions – far from it in fact. The shape of development in locational terms, because it includes a sizeable element of dispersal, would lead to an increase in greenhouse gas emissions. Concentrating development in and near Norwich is a much sounder spatial option if the requirements of paragraph 148 are to be met.
- Made the best attempt to comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Obviously by choosing to disperse a large amount of new housing greenhouse gas emissions will rise more rapidly than if development was all concentrated near

Norwich - pursuing dispersal makes it less likely that emissions will reach net zero by 2050.

- Complied with paragraph 150 of the NPPF which states that “new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.” Clearly dispersing a sizeable quantity of development is not locating housing in the right place to help reduce greenhouse gas emissions.
- Followed National Planning Practice Guidance (PPG) (2019) which states that: “effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases” and “Planning can also help increase resilience to climate change impact through the location, mix and design of development.” In addition, the PPG provides examples of mitigating climate change by reducing greenhouse gas emissions and adapting to climate change through “Reducing the need to travel and providing for sustainable transport”. Dispersing development is not locating new housing in the best place to reduce climate change impacts nor is it reducing the need to travel or making it easy to provide sustainable public transport.

\* \* Source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire – in this 3000 home development “total GHG emissions from operational phase (over 60 year design life) contribute 80% to the overall emissions of the Proposed Development.” Estimated operational emissions are summarised in Table 15-13 of the ES. Of these operational emissions four fifths (1,021,260 tonnes of CO<sub>2</sub>) will result from vehicle use.

Furthermore Hempnall Parish Council considers that the GNLP should remove plans to disperse housing in to village clusters and via policy 7.5 because this dispersal of development has a greater negative impact on the environment and landscape than that which would result from concentrating development in or near Norwich

It is clear from the table on page 80 of the GNLP papers from June 23rd, 2017 that dispersing development has far greater negative impacts on the environment and landscape than concentrating development in and close to Norwich.

Dispersal:

- Increases air, light and noise pollution
- Increases CO<sub>2</sub> emissions
- Causes more Greenfield sites to be built on
- Robs us of valuable agricultural land
- Threatens habitats and bio-diversity
- Suburbanises the countryside

Conclusions

- Hempnall Parish Council considers that the GNLP in its present form is un-sound (and quite possibly not legally compliant) because it has set the total housing potential number unnecessarily high - this is not compatible with NPPF paragraphs 148 and 149 nor does it comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050

- Furthermore we consider the GNLP to be un-sound because it chooses to disperse a significant amount of development, a policy which also does not “chime” with the requirements of NPPF paragraphs 148, 149 and 150 and the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050. Nor does it follow the guidance provided by National Planning Practice Guidance (PPG) (2019)
- Setting the housing number so high and dispersing some development in the way the GNLP suggests also has a number of very negative consequences in regard to the landscape and the environment.

#### A Sound Way Forward

- 1) Set the Total Housing Potential at the minimum local housing need figure of 40,541. This satisfies the Government’s Standard Methodology requirement.
- 2) Realise that by setting the housing target at 40,541 this number of new houses could be met by a combination of: 31,452 existing commitments; 5240 completions (2018 – 20); with the balance of 3,849 houses supplied by windfall developments and Brownfield sites in Norwich. In this scenario no new allocations for housing involving Greenfield sites need be made and therefore it would not be necessary to include any village cluster sites in the plan or utilise sites that might come forward as a result of policy 7.5. The negative aspects of dispersal would be avoided.
- 3) Accept that there is no need to introduce additional sites on the grounds that developers require more choice. The 31,452 existing commitments already provide an adequate supply of development land for many years to come and give developers all the flexibility they need in regard to site choices. Developers only build to market demand and if there is a surplus of sites they will simply “cherry pick” attractive rural sites and leave more sustainable sites land banked.
- 4) Learn from past mistakes. Clearly the JCS included a housing target that was far too large – hence 31,452 un-built commitments remain with only 5 years left on the plan. This time the GNLP should set a realistic target – 40,541 is probably already too large.
- 5) Concentrate development in and around Norwich. This is the best way to reduce greenhouse gas emissions. Setting a lower total housing potential makes this locational approach feasible.
- 6) Future proof the plan - Post Covid and Post Brexit things will be very different. Trends towards home working and internet shopping are leading to a reduction in the need for office and retail space in the city centre. In order to revitalise the city centre incorporate in to the GNLP the ever increasing potential for converting redundant office and retail space in to residential use. This is a sound approach NPPF paragraph 148 encourages: “the reuse of existing resources, including the conversion of existing buildings”. This kind of conversion could provide a large number of new dwellings in a sustainable location and take pressure of development in the countryside. The GNLP is possibly un-sound because it has not fully explored the potential for this kind of conversion.
- 7) Realise that the 5,000 houses included in the Total Housing Potential to provide an opportunity for extra capacity should the 2018 ONS household projection figures become reality could be treated as phased development i.e. even if sites for these houses are allocated they need only be brought forward for development if required. In this phased approach Brownfield sites should be prioritised. This way the GNLP will have soundly demonstrated that it is aware that the ONS 2018 projections may require this additional provision but also that it acknowledges the fact that this provision will only need to be brought on stream if the projections prove to be accurate.
- 8) Listen to parish councils who know what their residents want. For example in Hempnall the Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields

and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing.

9) Provide affordable housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing near Millfields. The site is owned by South Norfolk Council and they have asked for its inclusion in the GNLP as an allocated site. If their request is granted it will prevent its classification as an exception site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: "In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs". Rural exception sites enable local affordable housing requirements to be fully met. Reliance on market schemes fails to achieve this objective. For example the 23 house JCS development south of Bungay Road was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just one (7 then 5 then 3 now 1).

10) Lobby central government to insist on carbon zero building standards at the earliest opportunity. As things stand currently the GNLP, for much of its 20 year plan period, will not operate in an environment where the highest standards are required.

The value of the countryside and green spaces to the well being of all has been revealed throughout the Covid-19 pandemic. The Countryside deserves stronger protection in the GNLP than is currently on offer.

#### **Change suggested by respondent:**

A Sound Way Forward

- 1) Set the Total Housing Potential at the minimum local housing need figure of 40,541. This satisfies the Government's Standard Methodology requirement.
- 2) Realise that by setting the housing target at 40,541 this number of new houses could be met by a combination of: 31,452 existing commitments; 5240 completions (2018 – 20); with the balance of 3,849 houses supplied by windfall developments and Brownfield sites in Norwich. In this scenario no new allocations for housing involving Greenfield sites need be made and therefore it would not be necessary to include any village cluster sites in the plan or utilise sites that might come forward as a result of policy 7.5. The negative aspects of dispersal would be avoided.
- 3) Accept that there is no need to introduce additional sites on the grounds that developers require more choice. The 31,452 existing commitments already provide an adequate supply of development land for many years to come and give developers all the flexibility they need in regard to site choices. Developers only build to market demand and if there is a surplus of sites they will simply "cherry pick" attractive rural sites and leave more sustainable sites land banked.
- 4) Learn from past mistakes. Clearly the JCS included a housing target that was far too large – hence 31,452 un-built commitments remain with only 5 years left on the plan. This time the GNLP should set a realistic target – 40,541 is probably already too large.
- 5) Concentrate development in and around Norwich. This is the best way to reduce greenhouse gas emissions. Setting a lower total housing potential makes this locational approach feasible.
- 6) Future proof the plan - Post Covid and Post Brexit things will be very different. Trends towards home working and internet shopping are leading to a reduction in the need for office and retail space in the city centre. In order to revitalise the city centre incorporate in to the GNLP the ever increasing potential for converting redundant office and retail space in to residential use. This is a sound approach NPPF paragraph 148 encourages: "the reuse of existing resources, including the conversion of existing buildings". This kind of conversion could provide a large number of new dwellings in a sustainable location and take pressure of development in the countryside. The GNLP is possibly un-sound because it has

not fully explored the potential for this kind of conversion.

7) Realise that the 5,000 houses included in the Total Housing Potential to provide an opportunity for extra capacity should the 2018 ONS household projection figures become reality could be treated as phased development i.e. even if sites for these houses are allocated they need only be brought forward for development if required. In this phased approach Brownfield sites should be prioritised. This way the GNLP will have soundly demonstrated that it is aware that the ONS 2018 projections may require this additional provision but also that it acknowledges the fact that this provision will only need to be brought on stream if the projections prove to be accurate.

8) Listen to parish councils who know what their residents want. For example in Hempnall the Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing.

9) Provide affordable housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing near Millfields. The site is owned by South Norfolk Council and they have asked for its inclusion in the GNLP as an allocated site. If their request is granted it will prevent its classification as an exception site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: "In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs". Rural exception sites enable local affordable housing requirements to be fully met. Reliance on market schemes fails to achieve this objective. For example the 23 house JCS development south of Bungay Road was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just one (7 then 5 then 3 now 1).

10) Lobby central government to insist on carbon zero building standards at the earliest opportunity. As things stand currently the GNLP, for much of its 20 year plan period, will not operate in an environment where the highest standards are required.

**Legally No  
compliant:**

**Sound: No**

**Comply with Not specified  
duty:**

**Appear exam: Not specified**

**Attachments: None**

23689

Object

### Policy 7.4 Village Clusters, Policy 7.4 Village Clusters

**Respondent:** Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]

#### Summary:

Hempnall Parish Council considers that the Housing Growth Needs as set out in paragraphs 176 to 187 of the Draft GNLP Regulation 19 Publication (under Policy 1 – The Sustainable Growth Strategy in Section 5 of the document 'The Strategy') are unsound (and possibly not legally compliant) both in regard to the magnitude of the Total Housing Potential and in respect of the spatial distribution of development.

In particular we consider that both the total number of houses (Total Housing Potential) and the distribution of

development conflict with Climate Change objectives and potentially contradict objectives set in regard to environmental protection and enhancement including protection of the landscape.

Relevant NPPF paragraphs and Climate Change Act targets relating to concerns over the magnitude of the Total Housing Potential

The NPPF requires that: "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures" – paragraph 149

The Oxford English dictionary defines mitigating as: "having the effect of making something bad less severe, serious, or painful." Therefore the NPPF says that local plans should take a proactive approach in making something bad (i.e. climate change) less severe, serious or painful.

NPPF paragraph 148 states that the planning system: "should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions"

Climate Change Act 2008 has set a legally binding target for the UK to reduce its Greenhouse Gas emissions from 1990 levels by at least 80% by 2050.

The Climate Change Act 2008 (2050 Target Amendment) Order 2019

The UK has recently legislated to end its contribution to global warming by 2050, with a target that will require the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

Given that the carbon foot print resulting from the pre-construction and construction work necessary to build each new house is in the region of 100 tonnes of CO<sub>2</sub> \* then fulfilling the Total Housing Potential of 49,492 houses could generate 4,949,200 tonnes of CO<sub>2</sub> and this is just the amount of CO<sub>2</sub> resulting from building the houses. If the operational greenhouse gas emissions over the lifecycle of the properties is factored in the emissions total leaps to astronomical levels as the building phase is only responsible for about a quarter of total lifecycle emissions. Of course building methods could improve during the plan period, thus reducing both construction and operational emissions, but with the government constantly "kicking the can" down the road on introducing stricter building regulations this may well take many years to be realised and even with better standards total emissions resulting from the building and operation of 49,492 additional houses will still be very high.

There is a choice that can be made between retaining the policy draft figure of 49,492 or setting a lower total housing number in accordance with NPPF paragraph 60 which says that: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach"

Hempnall Parish Council contends that adherence to climate change policy should require local authorities to choose the minimum number of houses needed in order to comply with the local housing need assessment resulting from the appliance of the standard method in national planning guidance and to not set a housing target or housing potential at a higher level.

Therefore Hempnall Parish Council considers that the GNLP should reduce the Total Housing Potential to the level required to address local housing need as assessed by the standard method i.e. 40,541 dwellings as it is unsound to proceed with a Total Housing Potential for 49,492 extra houses by 2038 because the higher figure is not compatible with Government Climate Change Objectives.

In making a choice to proceed with the lower housing figure the GNLP would be demonstrating that:

- The plan has taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because it will have chosen the least damaging option in terms of greenhouse gas emissions (the huge CO2 emissions that would have resulted from building nearly 50,000 houses would be made less severe or serious) while still complying with NPPF paragraph 60. Of course the construction and operation of 40,541 houses will still generate enormous greenhouse gas emissions but the total will at least be around 20% less than if 49,492 were built.
- The plan has attempted to comply with NPPF paragraph 148, as best possible given the requirements of NPPF paragraph 60, by endeavouring to “shape places in ways that contribute to radical reductions in greenhouse gas emissions”. While choosing to build 40,541 extra houses is not going to lead to a radical reduction in greenhouse gas emissions making this choice radically lowers emission levels below those which would occur if 49,492 houses were built.
- The plan has attempted to comply, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050.

If the choice is made for the GNLP to proceed with the higher housing potential figure of 49,492 the plan will not have demonstrated that it has:

- Pursued a proactive approach to mitigate climate change impacts because it will have chosen an option that makes something bad (i.e. climate change) more severe and serious than it otherwise would have been if the lower local housing need figure was chosen. The plan would not be compliant with NPPF paragraph 149.
- Attempted to comply with NPPF paragraph 148 because it will have chosen not to take advantage of the opportunity to achieve the radically lower emission levels that would result from the adoption of the lower local housing need figure
- Complied, as best possible given the requirements of NPPF paragraph 60, with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050 because in not choosing the lower local housing need figure it will have facilitated the generation of considerably higher level of greenhouse gas emissions.

\*(source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire - this is 3000 home development. If you look to page 15, it says: “The total GHG emissions from pre-construction and construction are estimated to be in the order of 313,370 tCO2e” i.e. around 100 tonnes per house)

Furthermore Hempnall Parish Council considers that the GNLP should reduce the Total Housing Potential to the level required to address local housing need in order to provide a greater level of environmental and landscape protection

Clearly the land take to build 49,492 houses is considerably greater than that required to construct 40,541. Choosing the lower figure saves many Greenfields from the threat of development and in so doing makes it easier to protect countryside, habitats, landscape, flora and fauna.

Hempnall Parish Council's concerns over the distribution of Housing

Allocating new sites in villages as part of a dispersal policy is unsound as it conflicts with the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Concentrating development in and around Norwich is the best way to reduce greenhouse gas emissions as such development can more easily be based on the usage of public transport. There is increasing potential for more residential space to be provided in Norwich as a result of trends towards home working and internet shopping which are leading to a reduction in the need for office and retail space in the city centre.

Vehicle use is often the main contributor to operational emissions resulting from new housing \* \*. Therefore development that is dispersed will create a greater level of greenhouse gas emissions than development that is concentrated in or close to Norwich. Eventually private cars will all be electric or hydrogen powered but for the "shelf life" of the GNLP (to 2038) the transition will not have been completed and for the first 12 years (and probably more) of the plan the majority of vehicles will remain as petrol or diesel powered.

The table on page 80 of the GNDP papers from June 23rd, 2017 clearly showed that the best spatial option for new housing in order to minimise negative environmental consequences was Option 1: Urban Concentration close to Norwich. This option was the one which was best for: minimising, air, light and noise pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing bio-diversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; reducing the need to travel and promoting the use of sustainable transport modes; minimising the use of the best agricultural land and maintaining and enhancing water quality and its efficient use. In terms of all these and other factors taken together the least desirable option was Option 4: Dispersal of Development.

Unfortunately the obvious conclusion that should have followed on from the publication of this table, i.e. for the GNLP to be based on Option 1, was not pursued. Instead the distribution pattern for new housing envisaged in the draft plan, while it includes a degree of urban concentration, still promotes dispersal of development through proposals to make new allocations in Village Clusters and via policy 7.5. These allocations are in addition to the rural housing sites already included in current commitments carried over from the JCS and are additional to estimates for windfall developments in villages.

If the GNLP proposals for the location of new housing are not changed a sizeable chunk of development will end up being dispersed and the plan will not have:

- Taken a proactive approach to mitigating climate change impacts (as required by NPPF paragraph 149) because the plan would be facilitating a distribution pattern of development that produces greater greenhouse gas emissions than would be the case if a better option (Option 1) had been chosen
- Complied with NPPF paragraph 148 which seeks to "shape places in ways that contribute to radical reductions in greenhouse gas emissions" because it clearly does not shape the development of places in a way that enables there to be a radical reduction in greenhouse gas emissions – far from it in fact. The shape of development in locational terms, because it includes a sizeable element of dispersal, would lead to an increase in greenhouse gas emissions. Concentrating development in and near Norwich is a much sounder spatial option if the requirements of paragraph 148 are to be met.
- Made the best attempt to comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Obviously by choosing to disperse a large amount of new housing greenhouse gas emissions will rise more rapidly than if development was all concentrated near Norwich - pursuing dispersal makes it less likely that emissions will reach net zero by 2050.



- Complied with paragraph 150 of the NPPF which states that “new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.” Clearly dispersing a sizeable quantity of development is not locating housing in the right place to help reduce greenhouse gas emissions.
- Followed National Planning Practice Guidance (PPG) (2019) which states that: “effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases” and “Planning can also help increase resilience to climate change impact through the location, mix and design of development.” In addition, the PPG provides examples of mitigating climate change by reducing greenhouse gas emissions and adapting to climate change through “Reducing the need to travel and providing for sustainable transport”. Dispersing development is not locating new housing in the best place to reduce climate change impacts nor is it reducing the need to travel or making it easy to provide sustainable public transport.

\* \* Source: Climate Change section of the Environmental Statement for Chalgrove Airfield in Oxfordshire – in this 3000 home development “total GHG emissions from operational phase (over 60 year design life) contribute 80% to the overall emissions of the Proposed Development.” Estimated operational emissions are summarised in Table 15-13 of the ES. Of these operational emissions four fifths (1,021,260 tonnes of CO<sub>2</sub>) will result from vehicle use.

Furthermore Hempnall Parish Council considers that the GNLP should remove plans to disperse housing in to village clusters and via policy 7.5 because this dispersal of development has a greater negative impact on the environment and landscape than that which would result from concentrating development in or near Norwich

It is clear from the table on page 80 of the GNLP papers from June 23rd, 2017 that dispersing development has far greater negative impacts on the environment and landscape than concentrating development in and close to Norwich.

Dispersal:

- Increases air, light and noise pollution
- Increases CO<sub>2</sub> emissions
- Causes more Greenfield sites to be built on
- Robs us of valuable agricultural land
- Threatens habitats and bio-diversity
- Suburbanises the countryside

Conclusions

- Hempnall Parish Council considers that the GNLP in its present form is un-sound (and quite possibly not legally compliant) because it has set the total housing potential number unnecessarily high - this is not compatible with NPPF paragraphs 148 and 149 nor does it comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050
- Furthermore we consider the GNLP to be un-sound because it chooses to disperse a significant amount of

development, a policy which also does not “chime” with the requirements of NPPF paragraphs 148, 149 and 150 and the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to ‘net zero’ by 2050. Nor does it follow the guidance provided by National Planning Practice Guidance (PPG) (2019)

- Setting the housing number so high and dispersing some development in the way the GNLP suggests also has a number of very negative consequences in regard to the landscape and the environment.

#### Change suggested by respondent:

A Sound Way Forward

- 1) Set the Total Housing Potential at the minimum local housing need figure of 40,541. This satisfies the Government’s Standard Methodology requirement.
- 2) Realise that by setting the housing target at 40,541 this number of new houses could be met by a combination of: 31,452 existing commitments; 5240 completions (2018 – 20); with the balance of 3,849 houses supplied by windfall developments and Brownfield sites in Norwich. In this scenario no new allocations for housing involving Greenfield sites need be made and therefore it would not be necessary to include any village cluster sites in the plan or utilise sites that might come forward as a result of policy 7.5. The negative aspects of dispersal would be avoided.
- 3) Accept that there is no need to introduce additional sites on the grounds that developers require more choice. The 31,452 existing commitments already provide an adequate supply of development land for many years to come and give developers all the flexibility they need in regard to site choices. Developers only build to market demand and if there is a surplus of sites they will simply “cherry pick” attractive rural sites and leave more sustainable sites land banked.
- 4) Learn from past mistakes. Clearly the JCS included a housing target that was far too large – hence 31,452 un-built commitments remain with only 5 years left on the plan. This time the GNLP should set a realistic target – 40,541 is probably already too large.
- 5) Concentrate development in and around Norwich. This is the best way to reduce greenhouse gas emissions. Setting a lower total housing potential makes this locational approach feasible.
- 6) Future proof the plan - Post Covid and Post Brexit things will be very different. Trends towards home working and internet shopping are leading to a reduction in the need for office and retail space in the city centre. In order to revitalise the city centre incorporate in to the GNLP the ever increasing potential for converting redundant office and retail space in to residential use. This is a sound approach NPPF paragraph 148 encourages: “the reuse of existing resources, including the conversion of existing buildings”. This kind of conversion could provide a large number of new dwellings in a sustainable location and take pressure of development in the countryside. The GNLP is possibly un-sound because it has not fully explored the potential for this kind of conversion.
- 7) Realise that the 5,000 houses included in the Total Housing Potential to provide an opportunity for extra capacity should the 2018 ONS household projection figures become reality could be treated as phased development i.e. even if sites for these houses are allocated they need only be brought forward for development if required. In this phased approach Brownfield sites should be prioritised. This way the GNLP will have soundly demonstrated that it is aware that the ONS 2018 projections may require this additional provision but also that it acknowledges the fact that this provision will only need to be brought on stream if the projections prove to be accurate.
- 8) Listen to parish councils who know what their residents want. For example in Hempnall the Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current

development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing.

9) Provide affordable housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing near Millfields. The site is owned by South Norfolk Council and they have asked for its inclusion in the GNLPS as an allocated site. If their request is granted it will prevent its classification as an exception site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: "In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs". Rural exception sites enable local affordable housing requirements to be fully met. Reliance on market schemes fails to achieve this objective. For example the 23 house JCS development south of Bungay Road was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just one (7 then 5 then 3 now 1).

10) Lobby central government to insist on carbon zero building standards at the earliest opportunity. As things stand currently the GNLPS, for much of its 20 year plan period, will not operate in an environment where the highest standards are required.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** None

23563

Object

**Aylsham, 4.5****Respondent:** Mrs Libby Henshaw [19812]**Summary:**

No evidence of any attempts to engage with or consult the community about the changes from Reg18. Inaccuracies in the information about Aylsham raise questions about how well GNLP have researched the community and its infrastructure.

Two sites and 550 homes ( 83% increase on single site proposed in Reg 18) contradicts point 188 in the strategy section stating ' reasonable levels of growth in the main towns'

This is an unreasonable level of growth when the development of two large housing sites has only been recently completed in Aylsham.

Infrastructure inadequate, impact negative, Reg 19 should be withdrawn.

**Change suggested by respondent:**

There needs to be full public consultation about Reg 19 and evidence that the infrastructure of the town can support the increase in the number of houses and population., with specific reference to schools, social and health care, the antiquated sewage system, parking and roads into and within the town.

I would like to see specific evidence that these new plans have been considered in relation to Aylsham's neighbourhood plan and with North Norfolk District Council's plans to expand housing development at nearby Badersfield.

I would like to see firm confirmation of the size and site of a new school and whether one of Aylsham's existing schools will be closed

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23339

Object

**Utilities, 0360/3053/R10 Policy****Respondent:** Carrow Yacht Club (Mr John Henson) [19839]**Summary:**

The club is concerned that proposals for improved access on foot and bicycle do not adversely affect the vulnerability of the site to intruders and would welcome that this to be taken into account when any plans are made for new bridges and rights of ways.

The Club has covenants with the landowners that protect our open access to the site and specifically for the access of heavy cranes and low loaders as has been our practice and custom since the mid 1950's. We would expect that this club be treated as the other enterprises on the Deal Ground, notwithstanding the covenants are in existence.

**Change suggested by respondent:**

The strategic allocation for this area states: "Proposals for development must ensure that they will not place constraints on the operation of the existing rail connected asphalt and aggregates transshipment operation".

We would appreciate the addition of "and the operation of Carrow Yacht Club in the free movement through the site of heavy goods vehicles (specifically low loaders) and heavy cranes for recovery and launching of boats".

We would look for the Strategic Allocation to be amended:

"Deal Ground Development must also achieve the following site-specific requirements: 4) Proposals for development will ensure that these do not constraints upon the existing operation of Carrow Yacht Club, comprising its security and maintaining rights of way for vehicular access including low loaders and heavy cranes at all times".

All plans for the area should take account of the accessibility and security of the CYC site.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24295

Object

**Policy HETHEL1, HETHEL 1 Policy****Respondent:** Hethel Properties Ltd [20060]**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]

**Summary:**

Hethel Properties Ltd., as part landowners, support the principle of the employment allocations at HETHEL1 and HETHEL 2. In so doing they acknowledge that Hethel provides a strategic employment location, and is home to Lotus Cars, Historic Team Lotus, and the Hethel Engineering Centre.

However, whilst the principle of HETHEL1 is considered sound, in accordance with the tests set out in paragraph 35 of the National Planning Policy Framework (NPPF), its specific Settlement Boundary is not sound, as it is not justified. Minor alterations to the Settlement Map for Policy HETHEL 1 are therefore sought, to ensure its soundness.

The importance of Hethel to the Greater Norwich economy is rightly recognised within the GNLP Part 1 Strategy document, and as a strategic employment site it supports the significant growth axis within the Cambridge Norwich Tech Corridor, providing advanced manufacturing and engineering amongst other employment sectors. As such it supports the laudable vision and objectives (as outlined in Section 3 of Part 1 of the Strategy Plan) for Greater Norwich; that to generate the right levels of growth in the right places, thereby helping the local economy by stimulating economic investment and jobs during the Plan period to 2038. The Delivery Statement, as contained within Section 4, states that to promote the delivery of jobs, the Plan provides a wide range of type and size of employment sites, with most key strategic sites extensions of already successful developments, and this is the situation at Hethel. The proposed extensions to these employment allocations are therefore considered entirely appropriate.

In accordance with Policy 1 (The Sustainable Growth Strategy) HETHEL 1 and HETHEL 2 will also assist, in part, in facilitating the overall target for jobs growth, an increase off 33,000 jobs during the plan period from 2018 to 2038.

It is noted that the settlement boundary to both the HETHEL1 and HETHEL 2 proposed allocations are the same as currently within the Local Plan - Site Specific Allocations and Policies DPD (Adopted 2015). This (Map 004 Hethel) is attached as Appendix 1 for clarity. It would appear that the proposed Settlement Boundary for HETHEL 1 and HETHEL 2 has simply been reproduced for the current Reg.19 consultation of the Proposed Plan.

However, notwithstanding the in principle support of both HETHEL 1 and HETHEL 2 outlined above, there has been a material change in context since the 2015 allocation that warrants a minor change to the Settlement Boundary (and the associated 'Redevelopment of Existing Uses within Settlement Boundary') to ensure that the Plan is sound.

The proposed HETHEL 1 Settlement Boundary principally follows the line of Hethel Wood on its eastern boundary with the exception of that land towards the south eastern corner., that is omitted. The associated HETHEL 1 Site Specific Allocations (2015) Map 004 Hethel Plan shows no development in this area.

Since 2015 the parcel of land has been subject to a planning application (LPA Ref. 2015/2172/F) for a 'New race shop to house Classic Team Lotus' that received planning permission on 18/1/16, as subsequently amended (2016/1749) that received planning permission on 29/9/16. The associated Site Plan's for both permission's are attached as Appendix 2 and 3 for clarity.

This permission has subsequently been implemented, as indicated by the layout image shown on the Proposed HETHEL 1 allocation Map.

Accordingly, as shown on the updated Map submitted with this representation, and attached as Appendix 4, the boundary to HETHEL 1 should be amended to incorporate the land that has been developed to ensure that the Plan is sound.

**Change suggested by respondent:**

In order to ensure that the Hethel Strategic Employment Settlement Map (Policy HETHEL 1) is sound, a minor modification to the Settlement Boundary is required, as outlined in question 5 above, and shown on the attached Map (Appendix 4) to reflect the implemented planning permission.

**Legally Yes  
compliant:**

Sound: No

Comply with Yes  
duty:

Appear exam: Appearance at the examination

Attachments: None

24296

Object

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**Policy HETHEL 2, HETHEL 2 Policy**

**Respondent:** Hethel Properties Ltd [20060]

**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]

**Summary:**

Hethel Properties Ltd., as part landowners, support the principle of the employment allocations at HETHEL1 and HETHEL 2. In so doing they acknowledge that Hethel provides a strategic employment location, and is home to Lotus Cars, Historic Team Lotus, and the Hethel Engineering Centre.

However, whilst the principle of HETHEL1 is considered sound, in accordance with the tests set out in paragraph 35 of the National Planning Policy Framework (NPPF), its specific Settlement Boundary is not sound, as it is not justified. Minor alterations to the Settlement Map for Policy HETHEL 1 are therefore sought, to ensure its soundness.

The importance of Hethel to the Greater Norwich economy is rightly recognised within the GNLP Part 1 Strategy document, and as a strategic employment site it supports the significant growth axis within the Cambridge Norwich Tech Corridor, providing advanced manufacturing and engineering amongst other employment sectors. As such it supports the laudable vision and objectives (as outlined in Section 3 of Part 1 of the Strategy Plan) for Greater Norwich; that to generate the right levels of growth in the right places, thereby helping the local economy by stimulating economic investment and jobs during the Plan period to 2038. The Delivery Statement, as contained within Section 4, states that to promote the delivery of jobs, the Plan provides a wide range of type and size of employment sites, with most key strategic sites extensions of already successful developments, and this is the situation at Hethel. The proposed extensions to these employment allocations are therefore considered entirely appropriate.

In accordance with Policy 1 (The Sustainable Growth Strategy) HETHEL 1 and HETHEL 2 will also assist, in part, in facilitating the overall target for jobs growth, an increase off 33,000 jobs during the plan period from 2018 to 2038.

It is noted that the settlement boundary to both the HETHEL1 and HETHEL 2 proposed allocations are the same as currently within the Local Plan - Site Specific Allocations and Policies DPD (Adopted 2015). This (Map 004 Hethel) is attached as Appendix 1 for clarity. It would appear that the proposed Settlement Boundary for HETHEL 1 and HETHEL 2 has simply been reproduced for the current Reg.19 consultation of the Proposed Plan.

However, notwithstanding the in principle support of both HETHEL 1 and HETHEL 2 outlined above, there has been a material change in context since the 2015 allocation that warrants a minor change to the Settlement Boundary (and the associated 'Redevelopment of Existing Uses within Settlement Boundary') to ensure that the Plan is sound.

The proposed HETHEL 1 Settlement Boundary principally follows the line of Hethel Wood on its eastern boundary with the exception of that land towards the south eastern corner., that is omitted. The associated HETHEL 1 Site Specific Allocations (2015) Map 004 Hethel Plan shows no development in this area.

Since 2015 the parcel of land has been subject to a planning application (LPA Ref. 2015/2172/F) for a 'New race shop to house Classic Team Lotus' that received planning permission on 18/1/16, as subsequently amended (2016/1749) that received planning permission on 29/9/16. The associated Site Plan's for both permission's are attached as Appendix 2 and 3 for clarity.

This permission has subsequently been implemented, as indicated by the layout image shown on the Proposed HETHEL 1 allocation Map.

Accordingly, as shown on the updated Map submitted with this representation, and attached as Appendix 4, the boundary to HETHEL 1 should be amended to incorporate the land that has been developed to ensure that the Plan is sound.

**Change suggested by respondent:**

In order to ensure that the Hethel Strategic Employment Settlement Map (Policy HETHEL 1) is sound, a minor modification to the Settlement Boundary is required, as outlined in question 5 above, and shown on the attached Map (Appendix 4) to reflect the implemented planning permission.

**Legally Yes  
compliant:**



Sound: No

Comply with Yes  
duty:

Appear exam: Appearance at the examination

Attachments: None

24297

Object

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**Hethel, Settlement Map**

Respondent: Hethel Properties Ltd [20060]

Agent: Bidwells (Mr Darren Cogman, LP Contact) [12857]

**Summary:**

Hethel Properties Ltd., as part landowners, support the principle of the employment allocations at HETHEL1 and HETHEL 2. In so doing they acknowledge that Hethel provides a strategic employment location, and is home to Lotus Cars, Historic Team Lotus, and the Hethel Engineering Centre.

However, whilst the principle of HETHEL1 is considered sound, in accordance with the tests set out in paragraph 35 of the National Planning Policy Framework (NPPF), its specific Settlement Boundary is not sound, as it is not justified. Minor alterations to the Settlement Map for Policy HETHEL 1 are therefore sought, to ensure its soundness.

The importance of Hethel to the Greater Norwich economy is rightly recognised within the GNLP Part 1 Strategy document, and as a strategic employment site it supports the significant growth axis within the Cambridge Norwich Tech Corridor, providing advanced manufacturing and engineering amongst other employment sectors. As such it supports the laudable vision and objectives (as outlined in Section 3 of Part 1 of the Strategy Plan) for Greater Norwich; that to generate the right levels of growth in the right places, thereby helping the local economy by stimulating economic investment and jobs during the Plan period to 2038. The Delivery Statement, as contained within Section 4, states that to promote the delivery of jobs, the Plan provides a wide range of type and size of employment sites, with most key strategic sites extensions of already successful developments, and this is the situation at Hethel. The proposed extensions to these employment allocations are therefore considered entirely appropriate.

In accordance with Policy 1 (The Sustainable Growth Strategy) HETHEL 1 and HETHEL 2 will also assist, in part, in facilitating the overall target for jobs growth, an increase off 33,000 jobs during the plan period from 2018 to 2038.

It is noted that the settlement boundary to both the HETHEL1 and HETHEL 2 proposed allocations are the same as currently within the Local Plan - Site Specific Allocations and Policies DPD (Adopted 2015). This (Map 004 Hethel) is attached as Appendix 1 for clarity. It would appear that the proposed Settlement Boundary for HETHEL 1 and HETHEL 2 has simply been reproduced for the current Reg.19 consultation of the Proposed Plan.

However, notwithstanding the in principle support of both HETHEL 1 and HETHEL 2 outlined above, there has been a material change in context since the 2015 allocation that warrants a minor change to the Settlement Boundary (and the associated 'Redevelopment of Existing Uses within Settlement Boundary') to ensure that the Plan is sound.

The proposed HETHEL 1 Settlement Boundary principally follows the line of Hethel Wood on its eastern boundary with the exception of that land towards the south eastern corner., that is omitted. The associated HETHEL 1 Site Specific Allocations (2015) Map 004 Hethel Plan shows no development in this area.

Since 2015 the parcel of land has been subject to a planning application (LPA Ref. 2015/2172/F) for a 'New race shop to house Classic Team Lotus' that received planning permission on 18/1/16, as subsequently amended (2016/1749) that received planning permission on 29/9/16. The associated Site Plan's for both permission's are attached as Appendix 2 and 3 for clarity.

This permission has subsequently been implemented, as indicated by the layout image shown on the Proposed HETHEL 1 allocation Map.

Accordingly, as shown on the updated Map submitted with this representation, and attached as Appendix 4, the boundary to HETHEL 1 should be amended to incorporate the land that has been developed to ensure that the Plan is sound.

**Change suggested by respondent:**

In order to ensure that the Hethel Strategic Employment Settlement Map (Policy HETHEL 1) is sound, a minor modification to the Settlement Boundary is required, as outlined in question 5 above, and shown on the attached Map (Appendix 4) to reflect the implemented planning permission.

**Legally Yes  
compliant:**

Sound: No

Comply with Yes  
duty:

Appear exam: Appearance at the examination

Attachments: None

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**23837****Object****Policy HET1, HET1 Policy**

Respondent: Hethersett Parish Council (Clerk) [14326]

**Summary:**

Details are given in the attached document. They refer to 5.27 / 5.28 / 5.31 / 5.32 / and 5.33 (HET1/ HET 2/ HET 3) with a general summary of points on the GNLP.

**Change suggested by respondent:**

See attached document.

Modifications are suggested around the concise and specific use of language and in response to changing economic and ecological circumstances.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Appear exam: Appearance at the examination

Attachments: Regulation 19 - Hethersett Parish Council submission - <https://oc2connect.gnlp.org.uk/a/4wj>

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**23838****Object****Policy HET2, HET2 Policy**

Respondent: Hethersett Parish Council (Clerk) [14326]

**Summary:**

Details are given in the attached document. They refer to 5.27 / 5.28 / 5.31 / 5.32 / and 5.33 (HET1/ HET 2/ HET 3) with a general summary of points on the GNLP.

**Change suggested by respondent:**

See attached document.

Modifications are suggested around the concise and specific use of language and in response to changing economic and ecological circumstances.

Legally Yes

compliant:

Sound: No

Comply with Not specified

duty:

Appear exam: Appearance at the examination

Attachments: Regulation 19 - Hethersett Parish Council submission - <https://oc2connect.gnlp.org.uk/a/4wj>

23839

Object

**Policy HET3, HET 3 Policy****Respondent:** Hethersett Parish Council (Clerk) [14326]**Summary:**

Details are given in the attached document. They refer to 5.27 / 5.28 / 5.31 / 5.32 / and 5.33 (HET1/ HET 2/ HET 3) with a general summary of points on the GNLP.

**Change suggested by respondent:**

See attached document.

Modifications are suggested around the concise and specific use of language and in response to changing economic and ecological circumstances.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Regulation 19 - Hethersett Parish Council submission - <https://oc2connect.gnlp.org.uk/a/4wj>

23283

Support

**Aylsham, 4.1****Respondent:** Hevingham Parish Council (Mrs K N Medler, Clerk) [13686]**Summary:**

Any works should be staggered so traffic growth can be monitored along with the impact on services.

**Change suggested by respondent:**

-

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** None

23251

Support

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Wilson Wraight (Mr Dan Hewett, Head of Planning) [19699]

### Summary:

The comments in Section 5, paragraph 283 are acknowledged in that self and custom-build housing delivery is promoted through the GNLP on a range of sites. Policy 7.5 specifically promotes self and custom-build on smaller scale windfall sites and this is supported. This approach complements policies 5 and 7.4 and together provide the Council's with the necessary policy tools to increase the supply of housing in urban and rural areas and provide opportunities for small and medium enterprises to build houses, as well as for self and custom-build.

### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24153

Object

## Policy HNF2 0466R, HNF2 0466R Policy

**Respondent:** Mrs Janet Hill [16030]

### Summary:

Site allocation GNLP 0466R / HNF2. The policy in the Broadland District LP states that only those employment uses which have 'significant specific benefit from a use being located near the airport' shall be permitted.

Clearly this is intended as a sustainability reason for the location of and otherwise intrusive and inappropriately located industrial estate which extends the developed area of Norwich approx. 1m further north than currently exists into open and undeveloped greenfield countryside.

However it is noted that this condition is not continued in the GNLP policy for this site and this is clearly an omission which is contrary to sustainability principles as the location of such a development to the north eastern side of Norwich – adding transport miles to any communication to this location from more or less anywhere else in the County or Country is contrary to such principles.

### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24154

Object

## Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** Mrs Janet Hill [16030]

### Summary:

Comments on the failure to adequately address sustainability principles in the GNLP

The joint councils involved in the Greater Norwich Area are currently consulting on the revised local plan. This envisages significant growth in the population of around 16% between 2018 and 2038. The basis of the development plan has to be supported by 'sustainability principles'. This is one of the key underlying fundamentals which are supposed to guide development policy, yet at the same time, the County Council and other partners such as Anglian Water etc. are only too aware that there are massive water shortage problems in Norfolk, and East Anglia in general and have established a project the Sustainable Water Management Plan for Norfolk. From this evidence and other sources it is apparent that both our surface and ground water resources are being depleted by abstraction and drought issues faster than they can be recharged, and are projected to worsen, and that this is causing us to experience 'poor' quality ground water / surface water due to pollution and increasing concentrations of this due to diminishing volumes.

Clearly, if water is being used faster than it is being replenished then we are going to run short – in fact we already are, seriously so. Technology is not the answer as there are clearly no mechanisms in place to help to reduce demand sufficiently to compensate, and this is not a new problem as this issue has been discussed and known about since the 1990s and nothing has been done which would actually have any meaningful impact on the issues - who would pay and how basically.

There is no indication in the GNLP as to how this situation will be addressed in a measured, quantified, monitored and responsible manner which would indicate that this situation will not worsen, that damage to our health and environment (particularly by the drying out of key wetland habitats due to abstraction and the damage to Protected habitats and species) will not occur as a direct result of the amounts of growth provided for in the GNLP. As such the GNLP does not meet sustainability criteria and would be in contradiction of the Habitats Regulations.

Paragraph 162 of the Sustainable Growth Strategy seeks to promote Norwich as a key growth area to support the development of the national economy. It goes on to say that this will be compatible with 'protecting and enhancing the environment'. In preceding paragraphs it states that both greenfield and brownfield sites will be developed. The aims of the policy are fundamentally in conflict and cannot be reconciled. It is not possible to achieve large scale growth and protect and enhance the environment. The site allocations chosen and the development strategy proposed clearly will urbanise and pollute (air, water, light and noise) what are currently rural areas. It also removes the appeal and attractiveness of rural areas and replaces it with unattractive, unappealing urban sprawl. This is not consistent with protection of the environment and it is not correct to state that it is. The plan therefore fails to demonstrate that it is sustainable in this respect.

The fundamental tenant of sustainability is that it should not damage or harm the environment in a manner which will result in cumulative net adverse impacts. The choice of a largely un-developed rural county to be targeted for large scale development and growth in preference to other areas of the Country which are already developed / damaged, and in need of regeneration / already have unemployment figures which suggest an underemployed workforce is again contrary to sustainability principles.

Similarly the choice of an area of the Country with limited infrastructure and positioned poorly geographically, making transport costs and mileage greater than for other areas is again contrary to good sustainability principles. Other areas of the Country are much better connected, have better existing infrastructure and clearly will have significantly lower adverse environmental impacts from development than those proposed in the GNLP. No sequential test to compare or even consider these issues is contained in the Plan, and therefore it fails the test of sustainability on this account.

The sustainability references need to be considered further. Large scale development as proposed will require responses in the form of new hospitals, schools, medical facilities and personnel, social services, older person's services etc. These needs are referenced but not quantified and planned for within the GNLP and there are no indications where or specifically how they will be provided for although broad references to various sources of funding (none specific) are referred to. To propose large scale migration and development without ensuring that the means to support it are present and will be adequate / appropriately located is again risking an unsustainable community development and contrary to sustainability principles.

**Impact on protected Habitats – Habitats Regulations**

Under the Habitats Regulations, there is a requirement that development should not harm habitats protected by the Regs. There are numbers of sites within a short distance of the GNLP area – the Broads and North Norfolk Coast – which will

be significantly impacted by increased population growth. There is no detailed assessment in the GNLP of the impacts on Protected Habitats, supported by empirical evidence to assess the impacts, or the value of proposed mitigation measures. Commuted sums from some developments within a close radius of a specific site may have some offset capability to address impacts but this will be large scale, large area impacts which cannot be offset by commuted sums. Therefore the population growth projected will adversely impact on Protected Species and Habitats. Population growth allowed for in the Plan therefore exceeds that which can be supplied without harm to Habitats and Species and is contrary to sustainability principles and legislative requirements

**Change suggested by respondent:**

-

Legally Not specified  
compliant:

Sound: No

Comply with Not specified  
duty:

Appear exam: Not specified

Attachments: None

23769

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns**

Respondent: Mr John Hill [15088]

**Summary:**

The grounds of objection are the same as those made in response to Sections 352, Policy 1, Sections 192 and 179.

**Change suggested by respondent:**

Changes to the allocations should be made in accordance with the representations referred to above.

Legally Yes  
compliant:

Sound: No

Comply with No  
duty:

Appear exam: Written Representation

Attachments: None

23770

Support

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Mr John Hill [15088]**Summary:**

I support this policy and only wish that preparations were more advanced at this time thereby obviating the need to permit less sustainable and more damaging forms of development.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23771

Object

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Mr John Hill [15088]**Summary:**

See my representations to 352 and to Policy 7.2

**Change suggested by respondent:**

Deletion of this allocation.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None



23773

Object

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Mr John Hill [15088]**Summary:**

See my representations on 352 and Policy 7.2

**Change suggested by respondent:**

Deletion from the plan

**Legally compliant:** Yes**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** None

23710

Object

**Introduction, 162****Respondent:** Mr John Hill [15088]**Summary:**

I don't consider this plan to be very flexible because the time taken to get to final approval has and will take far too long "at a time of rapid change". There is so much uncertainty at present regarding the economy and future social trends, so it could be that some of the proposed allocations may not be needed in the plan period. But once allocations have been made it will be difficult for the planning authorities to "row back" and resist unwanted development in the future.

**Change suggested by respondent:**

This part of the plan would say that the plan is flexible because whilst there is a long-term "vision", specific land allocations are being limited in scope at this stage, subject to review in a few years time (e.g. five years) when conditions will have changed. The exception to this rule would be genuinely sustainable large-scale proposals, such as a new settlement, which require long-term commitment and certainty. (N.B. the above obviously implies that I think there should be changes to many of the policies and allocations in the GNLP and to the plan-making process itself.)

**Legally compliant:** Yes**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** None

23714

Object

**Housing Growth Needs, 179****Respondent:** Mr John Hill [15088]**Summary:**

Housing already delivered plus existing commitments adds up to 36,692 which is 90% of the total housing need up to 2038. This is a more than adequate provision for the time being given current certainties in a time of great change. Allocating additional specific greenfield sites in locations especially favoured by the private housing market will lead to early development pressures in those areas which will not help long term goals of sustainability, will cause further imbalance and will not be particularly helpful to central government's national objective of "leveling-up" the regions.

**Change suggested by respondent:**

Reduce the number of new greenfield allocations. Any "buffer" allowance on top of this should be based on the assumption of additional city and built-up area sites becoming available for redevelopment or conversion to residential following retail closures.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23717

Object

**Population, 39****Respondent:** Mr John Hill [15088]**Summary:**

This comment is not intended to suggest that the population forecasts are inaccurate in themselves. However, I consider that over-reliance on the traditional planning approach of analysing past trends, projecting them into the future and converting the figures into additional land requirements may simply result in "more of the same", i.e. unsustainable patterns of development rather than what is really needed in these challenging times which is the fostering of innovative and truly sustainable proposals.

**Change suggested by respondent:**

I consider that it should be made clear that the population projections, whilst being part of the Greater Norwich area profile, are not necessarily the major determinant of future land requirements especially the requirement for additional greenfield housing allocations. It should also be clarified (at an appropriate point in the text) that local projections should be seen in the context of national trends and projections in other regions and parts of the United Kingdom; such external factors will influence local land requirements if there is to be a sustainable future.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23735

Object

**The Settlement Hierarchy, 192****Respondent:** Mr John Hill [15088]**Summary:**

I disagree with the total numbers proposed (see comments on 179) and the distribution insofar as it refers to new greenfield allocations. The towns, key service centres and other villages have had a lot of housing growth in recent years and additional allocations will have a detrimental effect on their environment. Any new allocations made on the Norwich urban fringe should not be built before existing undeveloped, or unfinished allocations. There is a danger that sites preferred by the private housing market may be developed before less attractive sites even though the latter may have less overall environmental impact.

**Change suggested by respondent:**

I think Table 7 and the accompanying text should be revised in line with the above comments.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23738

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Mr John Hill [15088]**Summary:**

I consider that the housing proposals are not sustainable in their totality or in their distribution for the reasons given in my responses to 162,176,179 and 192.

**Change suggested by respondent:**

If changes are to be made to the housing allocations then one would expect that consideration would be given to potential changes to the planning situation in surrounding parts of the County and beyond as, clearly, the plan area does not exist in isolation.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23768

Object

**Aylsham, 352****Respondent:** Mr John Hill [15088]**Summary:**

I disagree that 550 additional dwellings are necessary to support the continued vitality of the town. The town has been greatly expanded in the last couple of decades and further expansion at this time will have a detrimental effect on the town, especially the historic town centre with it's network of narrow roads and pavements which is already being put under great stress. Additional development will also have a detrimental effect on the surrounding rural area and on local services. Further expansion becomes increasingly unsustainable.

**Change suggested by respondent:**

I think both allocations should be deleted from the plan at the present time. Of the two sites the one off Norwich Road to include specialist retirement homes and a transport hub appears to offer more benefit to the community than the other one.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23772

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr John Hill [15088]**Summary:**

See my representations on 352 and Policy 7.2 However it appears to me that this site with its proposal to include specialised extra care housing and a sustainable transport hub offers more benefit to the community and more opportunity for sustainable development than the site to the south of Burgh Road.

**Change suggested by respondent:**

Deletion of this site from the Plan.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23709

Object

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**Policy 0264, 0264 Policy****Respondent:** Mark Hindle [19939]**Summary:**

considered unsound because it will leave the land adjacent to this site (as shown on the attached map) land locked and unsuitable for any future use.

**Change suggested by respondent:**

incorporate this portion of land into the site GNLP 0264 for possible future development, to prevent it becoming land locked and un-used.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** Map - <https://oc2connect.gnlp.org.uk/a/45q>

24254

Object

**Policy 0503, 0503 Policy****Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]**Summary:**

GNLP0503 was submitted during the call for sites 2016. The landowners wish to withdraw the land from the plan (please see representation made by Hall Farm (Hingham Ltd) for details). Therefore, this site is undeliverable. Policies relating to the inclusion of GNLP0503 for development and the proposed 20 dwellings for this site are unsound.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Change suggested by respondent:**

GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes. Removal of GNLP0503 due to undeliverability of the site due to the caveat... "subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley". Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cv>

24255

Object

**Policy 0520, 0520 Policy****Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]**Summary:**

Representation regarding the inclusion of site GNLP0520 with reference to:

- Surface water flood risk
- Pedestrian Safety
- Detrimental impact on valued landscapes
- TPO trees and Highway access
- Pedestrian links to the Towns facilities
- Close proximity to the industrial area

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Change suggested by respondent:**

GNLP SHOULD NOT BE ADOPTED

Proper regard should be given to the representations made in opposition to GNLP0520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the town's facilities.

GNLP0520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for "future proofing" Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cv>

24257

Object

**Site Assessment Booklets and Studies, Green Infrastructure Study****Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]**Summary:**

Detail of the conservation area are incorrect and therefore unsound as an evidence base.  
 This is reference to the maps for Hingham, other maps may also be incorrect.  
 Any decision based on location and extent of the conservation area would therefore be unsound

Please see the document :  
 HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
 for detailed representations and evidence

**Change suggested by respondent:**

Review evidence base to ensure all maps showing conservation areas are correct. Review all decisions taken on the basis of the location and extent of a conservation area.

Please see the document :  
 HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
 for detailed representations and evidence

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cv>

24256

Object

**Site Assessment Booklets and Studies, Equalities Impact Assessment****Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]**Summary:**

The Equality Impact Assessment  
 , Policy Assessment Table (page 15) returned a Not Applicable result in the site-specific policies GNLP0520 and GNLP0503, in relation  
 to the impact on the protected group including those with disabilities.

The allocation of GNLP0520 is unsound it does not provide safe access to shops and services and is therefore contrary to NPPF 8. Promoting healthy and safe communities, para 91c

Please see the document :  
 HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
 for detailed representations and evidence



**Change suggested by respondent:**

**GNLN SHOULD NOT BE ADOPTED**

Proper regard should be given to the representations made in opposition to GNLN0520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the towns facilities.

GNLN0520 should be removed from the plan. Regard should be given to the submissions of residents of The Hops (Survey Appendix B) who are currently affected by the poor footway links to the Towns shops and facilities.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for alternative sites to come forward and for representations to be made

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for "future proofing" Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response for detailed representations and evidence

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf - <https://oc2connect.gnlp.org.uk/a/4cv>

24258

Object

**Hingham, Settlement Maps****Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]**Summary:**

The GNLP settlement map does not include the defined town centre area. This has led to the misinterpretation and misinterpretation that the Co-op being the "centre" of Hingham and to the negligence of the town's small independent businesses. The Co-op is placed outside of the Town Centre ad defined in the SNC

Local Plan Development Management Policies Document 2015 (Maps) DM.2.4 & 2.5(4) Hingham Town Centre Area - Policies DM.2.4 & 2.5

53, no reference is made in the GNLP to the defined Town Centre, showing an inconsistent approach to the significance of areas within a settlement and making the plan inconsistent with the SNC Local Plan Development Management Policies Document (2015) which is to be retained.

Neglect of the significance of the defined Town Centre is contrary to NPPF 7. Ensuring the vitality of town centres – para 85d and 85f. and

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response for detailed representations and evidence

**Change suggested by respondent:**

Include a defined Town Centre in the (relevant) GNLP settlement maps.

Review decisions based on location for development in relation to shops and services

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response for detailed representations and evidence

**Legally No compliant:**

**Sound:** No

**Comply with No duty:**

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf - <https://oc2connect.gnlp.org.uk/a/4cv>

24259

Object

**Hingham, 5.36****Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]**Summary:**

The plan is unsound as the landowner of site GNLP0503 has requested that it be withdrawn from the GNLP therefore the site and its allocated housing commitment is undeliverable.

During the Regulation 18C consultation there were concerns raised regarding the numbers of housing proposed for Hingham and push to deliver housing development "en masse" which could potentially overwhelm the town's facilities and infrastructure. 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.

The GNLN 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, these concerns have not been addressed.

The policy wording for GNLN0520 states "Land south of Norwich Road, Hingham (approx. 6.92 ha) is allocated for residential development. This will accommodate approximately 80 homes. More homes may be accommodated, subject to an acceptable design and layout being achieved, and any infrastructure issues addressed".

Policy wording states "5.36 Two sites are allocated providing for at least 100 new homes in the key service centre (one for 80 homes, one for 20 homes)"

Aside from GNLN0520 being objected to as being included in the plan, the policy wording itself is unsound and allows for more homes, without a maximum number being stipulated. If GNLN0503 were to remain in the plan, this would have the effect of potentially increasing the number of homes built and increasing density beyond that portrayed during public consultations, to enable absorption of undelivered housing numbers through other sites. This could lead to inappropriate housing numbers and densities arising, contrary to the recommendations made by "Authorities" such as Highways etc during the consultation process.

It is concerning to read that in the Bidwells submission for GNLN052050 the developer is already suggesting that the site can accommodate more than the suggested 80 homes and indeed above the housing numbers allocated for Hingham in the GNLN, and is anticipating GNLN0520 accommodating the 20 homes allocated to GNLN0503.

"3.11 ..... it is evident that the site can comfortably accommodate the minimum number of units identified by the proposed allocation, it has the potential, if required, to accommodate all of the growth proposed for Hingham (i.e. 100 dwellings). This is particularly relevant given that, as detailed in the Note to Policy GNLN0503, the second site in Hingham has potential access and amenity constraints. Given the suitability of the GNLN0520, as is demonstrated by this and previous Representations, it is recommended that, if GNLN0503 cannot demonstrate that it is deliverable, all of the growth afforded to Hingham is allocated on the site.

3.12 In addition, the site could accommodate additional growth, above the 100 dwellings allocated to Hingham, should it become evident that other sites across the GNLN area are undeliverable".

There has been no consideration to the cumulative impact of housing numbers delivered in Hingham over the past decades, during which time no infrastructure improvements have been made. The housing numbers in excess of 100 will dramatically increase the population of Hingham, with no investment in infrastructure or services to support the growing community. The impact on vital services such as the Doctors Surgery is of particular concern. See Representation 6

The allocation of GNLN0520 (along with the inference that it will deliver more than the 100 homes allocated to Hingham), adjacent to The Hops removes the element of choice for potential new residents wishing to purchase a new build home, being that the development allocations in 2 successive local plans are in the same location, provided by the same developer and will be (it is assumed) to the same style. Resulting in an over

prominent overbearing large development not in keeping with the overall character of the town.  
This is contrary to NPPF 12 Achieving well-designed places para 127

Please see the document :  
HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Change suggested by respondent:**

**GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM**

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes.

Removal of GNLP0503 due to undeliverability of the site due to the caveat ...." subject to provision of a safe access and a continuous footway at the west side of Dereham Road from the site access to Pottles Alley".

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

AND

**GNLP SHOULD NOT BE ADOPTED**

Proper regard should be given to the representations made in opposition to GNLP0520 being allocated for development, especially with regard to flooding issues, potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the towns facilities.

GNLP0520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for "future proofing" Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Please see the document :  
HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Legally No  
compliant:**

**Sound: No**

**Comply with No  
duty:**

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cv>

24260

Object

Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets

**Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]

**Summary:**

During the regulation 18C consultation a comprehensive submission was made by Hingham Town Council raising objection some sites being deemed as unsuitable for development and not being put forward for consultation as reasonable alternatives. With specific reference to the site assessments, the Town Council consider that there are a number of contradictions within the site assessments, the conclusion of sites put forward for housing development and the decisions on some sites to be deemed unsuitable, are extremely flawed and not based on proportionate evidence.

Of the sites consulted on during the Regulation 18C consultation, as previously stated the Town Council and residents consider GNL0520 unsuitable for development and objections were made against the site as a preferred option. Objections were also made against the following sites being deemed unsuitable and not being put forward for consultation as "reasonable alternatives": GNL0298 and GNL0335, GNL0501 and GNL0502.

The Town Council in their regulation 18C representation expressed that these options should be further explored. With regard to GNL0501 and 0502 there was a potential for community benefit, if additional land for the sports centre could have been incorporated with highway access being achievable via land owned by the Town Council. It is understood that the landowner is not pursuing development of GNL0501 and GNL0502 at this time, therefore this representation will not make further reference to these sites.

With regard to GNL0298 and GNL0335 (the same developer is promoting both sites), although housing numbers proposed are a concern, the development of these sites would offer the future community benefit of a community woodland and the access link to land which could have a potential to help achieve the aspirations of the community and Town Council by providing an area of land (GNL0395) which could be utilised for improving Hingham's infrastructure/facilities.

It is recognised that any development on agricultural land will have an initial negative impact on biodiversity and wildlife. NPPF 174b states plans should "pursue opportunities for securing measurable net gains for biodiversity". The allocation of GNL0520 and GNL0503, when judged against the proposal of delivering a community woodland in conjunction with GNL0298 and GNL0335, is contrary to NPPF para 174b.

As already demonstrated the Town Council consider the allocation of GNL0520 and GNL0503 in the GNL to be unsound, and therefore the GNL should not be adopted with the inclusion of either site.

Due to the GNL rejection of other sites promoted, no other sites in Hingham have been subject to public consultation as reasonable alternatives/sites with the potential for being developed. Therefore, residents have not made their views known via the consultation process in relation to the potential of GNL0298 and GNL0335 as housing allocation. Of the sites submitted (and remaining available) GNL0298 and GNL0335 would appear to offer an alternative to GNL0520, however residents views, such as submitted to the Town Council (evidence 3a) should be sought. The GNL is not justified, it has not fully taken into taking into account reasonable alternatives and the decisions to include GNL0520 /GNL0503 and reject alternatives sites is not based on proportionate evidence.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Change suggested by respondent:**

**GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM**

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes.

Removal of GNLP0503 due to undeliverability of the site due to the caveat ...." subject to provision of a safe access and a continuous footway at the west side of

Dereham Road from the site access to Pottles Alley".

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

**AND**

**GNLP SHOULD NOT BE ADOPTED**

Proper regard should be given to the representations made in opposition to GNLP0520 being allocated for development, especially with regard to flooding issues,

potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the town's facilities.

GNLP0520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.<sup>44</sup>

Consideration **MUST** be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for "future proofing" Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response for detailed representations and evidence

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf - <https://oc2connect.gnlp.org.uk/a/4cv>

**24400**

**Object**

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**Evidence Base, Statement of Consultation**

**Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]

**Summary:**

The GNLP process has not been a platform for local people to shape their surroundings and effective engagement between plan-makers and communities has not taken place (effective engagement should surely result in proper consideration of representations and measures undertaken to effect resolution of issues raised).

This is contrary to NPPF 3 – Plan Making

The South Norfolk Council Statement of Community Involvement has not been adhered to, therefore the GNLP is not legally compliant.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Change suggested by respondent:**

**GNLP SHOULD NOT BE ADOPTED IN ITS CURRENT FORM**

Removal of site GNLP0503 from the GNLP in accordance with the landowners wishes.

Removal of GNLP0503 due to undeliverability of the site due to the caveat ....” subject to provision of a safe access and a continuous footway at the west side of

Dereham Road from the site access to Pottles Alley”.

Removal of the 20 dwellings from the housing numbers specified for Hingham/Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward.

AND

**GNLP SHOULD NOT BE ADOPTED**

Proper regard should be given to the representations made in opposition to GNLP0520 being allocated for development, especially with regard to flooding issues,

potential impact on historical heritage, the protection of valued landscape, the adequacy of footway links and proximity to ALL of the towns facilities.

GNLP0520 should be removed from the plan.

Reconsider the housing numbers allocated for Hingham/Reconsult to allow for an alternative site to come forward and for representations to be made.

Consideration MUST be given to if a site would provide a benefit alongside the proposed housing development, and if it would enable opportunity to achieve the aspirations of the community/town council for “future proofing” Hingham to be able to provide facilities to a growing community.

Allocations of any sites should be based on firm evidence that proposals made in order to mitigate, are actually feasible and achievable.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response  
for detailed representations and evidence

**Legally No  
compliant:**

**Sound: No**

**Comply with No  
duty:**

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cv>

24401

Object

## Appendices, Appendix 1 Infrastructure Requirements

**Respondent:** Hingham Town Council (Mrs A Doe, Clerk) [12974]

### Summary:

GNLPart 1 The Strategy Appendix 1 – Infrastructure Requirements is in general very limited in its commitment to provide infrastructure to support the housing numbers allocated, with NO commitment to Hingham stipulated.

During the Regulation 18C consultation Hingham Town Council submitted representations to POLICY 4 - STRATEGIC INFRASTRUCTURE (see evidence 6a), There is no evidence to show that these representations have been given consideration.

With specific reference to Hingham, no infrastructure needs have been identified within the GNLPart, despite the cumulative impact of development within the town over the past decades and the extensive development in the nearby Breckland area.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response for detailed representations and evidence

### Change suggested by respondent:

Duty to Co-operate needs to be fulfilled in terms of a full and proper appraisal of Hingham to enable sustainable development, including improvements to infrastructure and services. This should include a commitment to improving the Library and inclusion of any results of the NCC Parish Partnership Scheme study, that identifies a feasible solution to improving junction safety at the Attenborough Rd/Dereham Rd/B1108 Fairland crossroads and the inclusion of a pedestrian priority crossing point that will best serve all residents of Hingham, therefore giving value to the £10,000 investment already made (50/50 Hingham Town Council and NCC)

With regard to housing numbers a maximum housing allocation should be set for each allocated site, to ensure aggressive development doesn't take place and appropriate densities are not disregarded.

Please see the document :

HTC Greater Norwich Local Plan Regulation 19 Consultation Response for detailed representations and evidence

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** HTC Greater Norwich Local Plan Regulation 19 Consultation Response.pdf - <https://oc2connect.gnlp.org.uk/a/4cv>



24437

Object

**Rackheath, Settlement Map****Respondent:** Sandra and Joe Hodges [20013]**Petition:** 2 petitioners**Summary:**

I am writing to you to let you know how concerned my husband and I are about al the planning that is going on around Rackheath Hall.

As you know Rackheath Hallis a grade 2 listed building along with the bridge and the exhibition gates at the entrance. It is therefore a heritage site and as such it should be free of buildings and left as open parkland , where possible retaining as much of the historic landscape as possible.

With the building of the N.D.R it is now also the buffer zone between North East Norwich and considered a green oasis. So when we heard that if the council could have cycle paths and footpaths across this land they would allow the owners of Home farm to build we were extremely worried. It is supposed to be a buffer zone and an oasis of green so how could this be? Also we have since seen the designs of the proposed properties which would not sit well in the landscape at all. The proposed area is on the highest point of the Rackheath grounds . Plus there is the danger having to come in and out onto the Wroxham road , not far from the roundabout there with the N.D.R . Since that has been built the traffic has been much greater and often queues back in both directions..

We also understand that there are other planning proposals for the Rackheath grounds , at Home Farm itself and in the Woods behind. It seems it is being ignored that we have Heritage status.

Is it not enough that we shall be surrounded by huge building sites in the coming years asthere is one at White house farm which we will see just the other side of the bluebell woods GNLPO132 Beeston Park opposite on the Wroxham Road which we understand will have 3,800dwellings , and in the East along the NDR 205 dwellings. Surely this is enough for any area , it should not be necessary to build on the buffer zone.

As it is we are worried about the wildlife that is going to be affected by all this building. My husband and I walk in the area often especially at present and it is a joy to see the deer in the woods and in the fields that will soon be bricks and mortar. All this building is going to bring more people onto the land and we are lucky to have such a variety of wildlife in the form of birds , plants , trees , small mammals and water creatures too because of the lakes. If our grounds are not protected they will disappear.

So as you can see we are very concerned about any building taking place on the Rackheath Park Heritage land , it will not fit with the area.

I do hope you will take our concerns into consideration and keep the land as a green oasis

**Change suggested by respondent:**

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**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

24167

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Honingham Parish Council (Ms Jordana Wheeler, Clerk) [14400]

### Summary:

Response to the Greater Norwich Local Plan Regulation 19 consultation: Policy 7.1 – Norwich Urban Area including the fringe villages

Policy 7.6 – Preparing for New Settlements

This response addresses significant flaws in the classification of Honingham as being part of the urban fringe, linked to Easton, under Policy 7.1, and the proposal of a Garden Village at Honingham Thorpe under Policy 7.6.

The proposals are flawed on the following grounds:

- Insufficient account has been taken of the dramatic change and decrease in the retail offering in Norwich, which provides for a significant redevelopment from retail to housing. These changes are very likely to provide a significant increase in housing development, thereby reducing the need for “garden villages” in Norfolk.
- Policy 7.1 links the village of Honingham with Easton, which is designated as urban fringe. Honingham is, however, a rural village with a long history and certainly not urban fringe. Hence it is erroneous and damaging to link the village with Easton and consider the impact of massive development in this context. Arguably, this is deliberately misleading and seeks to provide justification for the plans.
- The proposed garden village at Honingham Thorpe under Policy 7.6, if it were to proceed would swamp the village of Honingham and totally destroy the culture, heritage and ambiance of the locality.
- The provision of the garden village will significantly and adversely affect the rural nature of this village being in a prominent position near to the heritage assets of the war memorial and heritage cottages.
- The village cannot adequately cope with further housing; it has very limited infrastructure of road networks, and no medical facilities, shops or schools.
- There are few job opportunities in the area. The inhabitants of the proposed houses in the urban fringe of Easton and Honingham, and the garden village, would almost certainly have to commute to Norwich, adding to further traffic congestion.
- The village has a very limited bus service, with a request stop only outside of the main village. The bus schedule is not conducive to being used by those travelling to work as the service stops at 5pm.
- The drainage in Honingham is already under stress and flooding on The Street has become a significant issue, further housing would only exacerbate the problem.
- The result of any development in Honingham would turn a small rural village with considerable identity and heritage into an urban fringe of Norwich. Such a development would be entirely counter to the ethos of Norfolk as a rural county.

### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24168

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Honingham Parish Council (Ms Jordana Wheeler, Clerk) [14400]**Summary:**

Response to the Greater Norwich Local Plan Regulation 19 consultation: Policy 7.1 – Norwich Urban Area including the fringe villages

Policy 7.6 – Preparing for New Settlements

This response addresses significant flaws in the classification of Honingham as being part of the urban fringe, linked to Easton, under Policy 7.1, and the proposal of a Garden Village at Honingham Thorpe under Policy 7.6.

The proposals are flawed on the following grounds:

- Insufficient account has been taken of the dramatic change and decrease in the retail offering in Norwich, which provides for a significant redevelopment from retail to housing. These changes are very likely to provide a significant increase in housing development, thereby reducing the need for “garden villages” in Norfolk.
- Policy 7.1 links the village of Honingham with Easton, which is designated as urban fringe. Honingham is, however, a rural village with a long history and certainly not urban fringe. Hence it is erroneous and damaging to link the village with Easton and consider the impact of massive development in this context. Arguably, this is deliberately misleading and seeks to provide justification for the plans.
- The proposed garden village at Honingham Thorpe under Policy 7.6, if it were to proceed would swamp the village of Honingham and totally destroy the culture, heritage and ambiance of the locality.
- The provision of the garden village will significantly and adversely affect the rural nature of this village being in a prominent position near to the heritage assets of the war memorial and heritage cottages.
- The village cannot adequately cope with further housing; it has very limited infrastructure of road networks, and no medical facilities, shops or schools.
- There are few job opportunities in the area. The inhabitants of the proposed houses in the urban fringe of Easton and Honingham, and the garden village, would almost certainly have to commute to Norwich, adding to further traffic congestion.
- The village has a very limited bus service, with a request stop only outside of the main village. The bus schedule is not conducive to being used by those travelling to work as the service stops at 5pm.
- The drainage in Honingham is already under stress and flooding on The Street has become a significant issue, further housing would only exacerbate the problem.
- The result of any development in Honingham would turn a small rural village with considerable identity and heritage into an urban fringe of Norwich. Such a development would be entirely counter to the ethos of Norfolk as a rural county.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24369

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Hopkins Homes [16109]**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]**Summary:**

The policy's objective of providing a full range of types, tenure and costs of housing to meet varied housing needs is, in principle, supported. In addition, the provision of minimum space standards and requirements for adaptable homes to be provided to improve the quality of life and meet the needs of an ageing population is, in principle, also supported. However, whilst we share the GNLP's desire to provide good quality homes there are a number of elements of the Policy that require alteration to ensure soundness.

#### Affordable Housing

As drafted the policy states that only applications on brownfield sites will be able to challenge affordable housing provision at the application stage. The policy should, in accordance with paragraph 57 of the NPPF recognise that, notwithstanding work to inform a site allocation in the Local Plan, a viability assessment can be submitted at the application stage. The NPPF advises that the weight afforded to the viability assessment at the application stage will be a matter for the decision maker and will have regard to all circumstances in the case, including whether the evidence underpinning the local plan is up to date and whether there has been a change in circumstances since the plan was brought into force.

On this basis, to ensure the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

#### Space Standards

Whilst the intention to adopt the Government's Nationally Described Space Standard (NDSS) is readily acknowledged, it is essential that the policy explicitly provides the necessary justification, as required by footnote 46 of paragraph 127 NPPF. This clearly states: "Policies may also make use of the nationally described space standard, where the need for internal space standard is justified".

This justification is essential, as strict adherence to space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. For example, in terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow those on lower incomes to afford a property which has their required number of bedrooms.

At this stage, notwithstanding the PPG, there would appear to be no robust evidence that would suggest that development below space standards is a particular concern throughout the GNLP area, and that the rigid adherence to NDSS is necessary.

Accordingly, we would suggest that if this element of the policy is to be retained that, as a minimum requirement, the policy should provide some flexibility to recognise need and viability, where necessary.

#### Self and Custom Build

The provision of self and custom build is recognised. However, the threshold that at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots is not considered to be justified.

The threshold would result in the number of self and custom build units provided being substantially in excess of the identified need. As stated at paragraph 282, there are only 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The strategic sites identified on the GNLP i.e. those over 1,000 units, would on their own, deliver substantially more than the identified need.

Whilst it is recognised (and welcomed) that the policy includes wording that provision is not required if there is no need, it is suggested that the threshold is increased to a level which better reflects need.

On this basis, the policy is neither considered to be justified or effective and, therefore, is not sound.

**Change suggested by respondent:****Affordable Housing**

The policy should be revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

**Space Standards**

In the apparent absence of the necessary robust evidence to justify it, the policy should provide some flexibility to recognise need and viability, where necessary.

**Self and Custom Build**

The threshold should be increased, to better reflect the likely need.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

24347

Object

**Policy DRA1, DRA1 Policy****Respondent:** Hopkins Homes [16109]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Summary:**

On behalf of our client, Hopkins Homes Limited, we are pleased to make representations to the Greater Norwich Local Plan (GNLP) Regulation 19 consultation with respect to Policy DRA1 that allocates land east of Cator Road and north of Hall Lane, Drayton for residential development. Please find enclosed with this letter the required Representation Form and a location plan of our client's site.

Our client supports the allocation of their site for residential development but considers Policy DRA1 as currently worded to be unjustified, ineffective, and therefore unsound as it fails to take account of the most recent position with respect to planning permissions on the site.

See attachment for full representation

**Change suggested by respondent:**

In order to ensure the GNLP is sound, Policy DRA1, its supporting text and accompanying maps should be amended to reflect our client's full planning application.

See attachment for full representation

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** L0005 - GNLP Reps.pdf - <https://oc2connect.gnlp.org.uk/a/4dj>

L0005 - GNLP Reps Enclosure 2 - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4dk>

24368

Support

**Policy 0312, 0312 Policy****Respondent:** Hopkins Homes [16109]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Summary:**

Hopkins Homes consider the emerging GNLP to be sound and support the allocation of Land to the east of Beccles Road, Loddon for at least 180 homes, under Policy GNLP0312.

Policy GNLP0312 as drafted currently states:

'.....The development will be expected to address the following specific matters:

1. Two points of vehicular access to be provided into the site.....'

Further work has been undertaken by Hopkins Homes in respect of access to the site and as such, a single access plus emergency access solution is considered appropriate. Discussions with the Highway Authority, Norfolk County Council are on going in this regard (see supporting letter and appendices submitted in conjunction with this form).

**Change suggested by respondent:**

We request that point 1 of Policy GNLP0312 is modified as set out below:

Land to the east of Beccles Road, Loddon (approx. 7.70 ha) is allocated for residential development. This site is likely to accommodate at least 180 homes.

More homes may be accommodated, subject to an acceptable design and layout being achieved and any infrastructure issues addressed.

The development will be expected to address the following specific matters:

1. An appropriate and safe access solution must be provided to the site.
2. Areas of surface water flooding on the Beccles Road boundary or elsewhere in the site to be addressed
3. Any development must conserve and enhance the significance of listed buildings within the Loddon and Chedgrave Conservation Area to the north-west of the site, including any contribution made to that significance by setting
4. Design and layout must address the topography of the site and potential impact on views, particularly to and from the Broads.
5. The trees/hedgerows surrounding the site will be protected, enhanced and incorporated into the scheme.
6. An ecological assessment must be carried out, and any identified impacts on nearby sites mitigated
7. The design and layout of the scheme must consider amenity impacts relating to the nearby business area.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Cover Letter - HH Reps GNLP0312 Reg 19 March 2021.pdf - <https://oc2connect.gnlp.org.uk/a/4wd>  
 Appendix 2ii - Supp LVA.pdf - <https://oc2connect.gnlp.org.uk/a/4ww>  
 Appendix 2i - Rev C Concept Masterplan.pdf - <https://oc2connect.gnlp.org.uk/a/4wf>  
 Appendix 1 - Land at Loddon HH, GNLP Rep March 2020 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4wg>

24370

Support

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns**

**Respondent:** Hopkins Homes [16109]

**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]

**Summary:**

The proposed Settlement Hierarchy and the identification of Aylsham as a Main Town that collectively with the other Main Towns (which are Diss (including part of Roydon), Long Stratton, Harleston and Wymondham) will accommodate 14% of the housing growth during the period to 2038 is strongly supported.

The Main Towns, including Aylsham, play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. They represent engines of rural growth and it is essential that they are able to grow at appropriate scales, having regard to infrastructure and environmental issues.

Aylsham has a good range of shops and services with local employment opportunities and to support the continued vitality of Aylsham, and reflect its sustainable nature, approximately 550 additional homes are proposed to be allocated across two sites.

Transport links to and from Aylsham via the A140 are also good, including regular bus services to Norwich and North Norfolk.

Development of this scale is capable of providing infrastructure improvements, such as land for a primary school, and green infrastructure, which will provide benefits to both existing and future residents.

This approach is entirely consistent with paragraph 72 of the NPPF, which advises that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities.”

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

**24371****Object****Policy 0311 0595 2060, 0311 0595 2060 Policy**

**Respondent:** Hopkins Homes [16109]

**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]



**Summary:**

On behalf of Hopkins Homes, we continue to strongly support the proposed allocation of GNLP0311, GNLP0595 and GNLP2060, Land South of Burgh Road and West of A140, Aylsham. The following Representation considers GNLP0311, GNLP0595 and GNLP2060 as one site. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the plan period to 2038.

For clarity, the previous representations made to the Regulation 18(C) 'Preferred Allocation' consultation in March 2020, and Regulation 18 consultation are also provided, as Appendix 1.

GNLP0311, GNLP0595 and GNLP2060 have been identified as a proposed allocation for approximately 250 homes, across a site area of approximately 12.86 ha. and new primary school. The preferred allocation outlines that the development will be expected to address 8 specific matters. An updated Concept Masterplan, prepared by CSA Environmental, is provided in support of this representation (as Appendix 2), to demonstrate how the site can be developed, in the context of the site policies specific matters

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the proposed allocation represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, minor alterations are proposed to the detailed wording of the policy to ensure it is justified and, therefore, sound.

See attachment for full representation

**Change suggested by respondent:**

See attachment for suggested minor changes to the policy wording

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/4wh>

24171

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Hopkins Homes (Mr Chris Smith, Development Planner) [14202]**Summary:**

As previously outlined under the Settlement Strategy, Hopkins Homes considers that the villages of Mulbarton and Scole should be formally identified as a Key Service Centres. In particular, Mulbarton, with an existing population in excess of 3,500 is larger and more sustainable than over half of the currently designated Key Service Centres, whilst the village also benefits from a proportionately good range of services and facilities.

Whilst Wroxham has been identified as a 'Key Service Centre', no additional allocations are currently proposed to enable future housing growth. Hopkins Homes have previously made Representations to the GNLP that in order to suitably fulfil its role as a Key Service Centre, allocations for the proportionate further residential growth of Wroxham should be made. A copy of these previous Representations are now included as Appendices to these current Representations.

**Change suggested by respondent:**

The suggested justification for not proposing any allocations for the growth of Wroxham appears to centre upon unsubstantiated claims of undue traffic and air quality impacts, together with perceived landscape impacts due to the proximity to The Broads. The available evidence does not support these claims.

In respect of traffic and air quality matters, Norfolk County Council's 'Wroxham and Hoveton Network Improvement Strategy' of February 2020 highlighted the good level of available public transport in Wroxham, whilst also noted that existing air quality issues are focussed to the north of the Bridge between Wroxham and Hoveton, with the dominant direction of travel being south towards Norwich. As such, additional growth to the south of Wroxham would have no material impact upon these matters.

In respect of landscape impacts and proximity to The Broads, previous studies and evidence have concluded that additional growth to the south of Wroxham would have no direct visual relationship or impact upon The Broads, with significant resulting separation remaining in place.

Given the otherwise wholly sustainable location of the available land to enable the future growth of Wroxham, in order to suitably fulfil its intended role and function as a Key Service Centre, allocations for additional residential development should be made.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Rep - <https://oc2connect.gnlp.org.uk/a/4vj>  
 Appendices\_Previous Greater Norwich Local Plan Repls\_March 2020.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vk>

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**The Settlement Hierarchy, 191**

**Respondent:** Hopkins Homes (Mr Chris Smith, Development Planner) [14202]

**Summary:**

Hopkins Homes have previously suggested that in order for the growth strategy to be considered 'sound' the defined 'Key Service Centres' identified in Paragraph 191 (iii) should include a number of other settlements throughout the Plan area which are of a size and functional role which can suitably accommodate additional residential growth in a sustainable way.

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.

In respect of Mulbarton, the existing population in excess of 3,500 is higher than that of over half of the currently suggested designated Key Service Centres, which therefore further confirms the appropriateness of higher levels of proportionate housing growth than currently proposed within the Draft Plan.

**Change suggested by respondent:**

Hopkins Homes would therefore suggest that for the Plan to be made 'sound', the settlements of Mulbarton and Scole should be added to the list of settlements defined as 'Key Service Centres' and the Key Diagram and Map 7 updated to reflect this.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Rep - <https://oc2connect.gnlp.org.uk/a/4vj>  
Appendices\_Previous Greater Norwich Local Plan Repls\_March 2020.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vk>

24170

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Hopkins Homes (Mr Chris Smith, Development Planner) [14202]**Summary:**

Whilst Hopkins Homes understands the Government's desire to promote the development of housing via Self and Custom-Build, it is common knowledge that the vast majority of demand for such housing is upon smaller and individual development sites in predominantly rural locations, rather than as a small portion of a larger development site.

**Change suggested by respondent:**

To this end, in order for the Plan to be 'Sound', the wording in Paragraph 283 and in the final Paragraph of Policy 5 should be amended to indicate that proposals for self-build dwellings will be encouraged to come forward in sustainable locations and that specific smaller sites in rural locations will be Allocated for this purpose.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Full Rep - <https://oc2connect.gnlp.org.uk/a/4vj>  
 Appendices\_Previous Greater Norwich Local Plan Repls\_March 2020.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vk>

24172

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Hopkins Homes (Mr Chris Smith, Development Planner) [14202]**Summary:**

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.

**Change suggested by respondent:**

-

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Full Rep - <https://oc2connect.gnlp.org.uk/a/4vj>  
 Appendices\_Previous Greater Norwich Local Plan Repls\_March 2020.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vk>

24522

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Hopkins Homes (Mr Chris Smith, Development Planner) [14202]**Summary:**

To reflect our comments made upon the Settlement Hierarchy, in order for the growth strategy to be considered 'sound', Hopkins Homes suggests that the list of defined 'Key Service Centres' proposed within the Table under 'Housing' should be amended to add the settlements of Mulbarton and Scole.

As will also be outlined further below, sufficient levels of growth should be allocated to each of the defined 'Key Service Centres' to enable them to respectively fulfil their roles to provide for sufficient housing and economic growth over the Plan period.

**Change suggested by respondent:**

To reflect our comments made upon the Settlement Hierarchy, in order for the growth strategy to be considered 'sound', Hopkins Homes suggests that the list of defined 'Key Service Centres' proposed within the Table under 'Housing' should be amended to add the settlements of Mulbarton and Scole.

As will also be outlined further below, sufficient levels of growth should be allocated to each of the defined 'Key Service Centres' to enable them to respectively fulfil their roles to provide for sufficient housing and economic growth over the Plan period.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Rep - <https://oc2connect.gnlp.org.uk/a/4vj>  
 Appendices\_Previous Greater Norwich Local Plan Repls\_March 2020.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vk>

24173

Object

**Wroxham, 5.60****Respondent:** Hopkins Homes (Mr Chris Smith, Development Planner) [14202]

**Summary:**

Whilst Wroxham has been identified as a 'Key Service Centre', no additional allocations are currently proposed to enable future housing growth. Hopkins Homes have previously made Representations to the GNLP that in order to suitably fulfil its role as a Key Service Centre, allocations for the proportionate further residential growth of Wroxham should be made. A copy of these previous Representations are now included as Appendices to these current Representations.

The suggested justification within Paragraph 5.60 for not proposing any allocations for the growth of Wroxham appears to centre upon unsubstantiated claims of undue traffic and air quality impacts, together with perceived landscape impacts due to the proximity to The Broads. The available evidence does not support these claims.

In respect of traffic and air quality matters, Norfolk County Council's 'Wroxham and Hoveton Network Improvement Strategy' of February 2020 highlighted the good level of available public transport in Wroxham, whilst also noted that existing air quality issues are focussed to the north of the Bridge between Wroxham and Hoveton, with the dominant direction of travel being south towards Norwich. As such, additional growth to the south of Wroxham would have no material impact upon these matters.

In respect of landscape impacts and proximity to The Broads, previous studies and evidence have concluded that additional growth to the south of Wroxham would have no direct visual relationship or impact upon The Broads, with significant resulting separation remaining in place.

The Map contained beneath Paragraph 5.61 clearly shows that neither the land East of Salhouse Road (Site Reference GNLP2131) nor that South of Wherry Gardens (Site Reference 2135) would materially result in residential development encroaching further towards The Broads than that of areas of existing, longstanding residential development.

**Change suggested by respondent:**

Given the otherwise wholly sustainable location of the available land to enable the future growth of Wroxham, in order to suitably fulfil its intended role and function as a Key Service Centre, allocations for additional residential development should be made.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/4vz>  
Appendices\_Previous Greater Norwich Local Plan Repls\_March 2020.pdf - <https://oc2connect.gnlp.org.uk/a/4vm>

24392

Object

**Policy 5 Homes, Policy 5 Homes**

**Respondent:** Hopkins Homes, Persimmon Homes and Taylor Wimpey [16216]

**Agent:** Bidwells (Mrs Sarah Hornbrook, Associate) [14444]

**Summary:**

The policy's objective of providing a full range of types, tenure and costs of housing to meet varied housing needs is, in principle, supported. In addition, the provision of minimum space standards and requirements for adaptable homes to be provided to improve the quality of life and meet the needs of an ageing population is also supported.

However, there are a number of elements of the Policy that are not currently sound, as they are not justified or consistent with national policy.

**Affordable Housing**

As drafted the policy states that only applications on brownfield sites will be able to challenge affordable housing provision at the application stage. The policy should, in accordance with paragraph 57 of the NPPF recognise that, notwithstanding work to inform a site allocation in the Local Plan, a viability assessment can be submitted at the application stage. The NPPF advises that the weight afforded to the viability assessment at the application stage will be a matter for the decision maker and will have regard to all circumstances in the case, including whether the evidence underpinning the local plan is up to date and whether there has been a change in circumstances since the plan was brought into force.

On this basis, to ensure the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

**Space Standards**

Whilst the intention to adopt the Government's Nationally Described Space Standard (NDSS) is readily acknowledged, it is essential that the policy explicitly provides the necessary justification, as required by footnote 46 of paragraph 127 NPPF. This clearly states: "Policies may also make use of the nationally described space standard, where the need for internal space standard is justified".

This justification is essential, as strict adherence to space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. For example, in terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow those on lower incomes to afford a property which has their required number of bedrooms. At this stage, notwithstanding the PPG, there would appear to be no robust evidence that would suggest that development below space standards is a particular concern throughout the GNLP area, and that the rigid adherence to NDSS is necessary.

Accordingly, we would suggest that if this element of the policy is to be retained that, as a minimum requirement, the policy should provide some flexibility to recognise need and viability, where necessary.

**Self and Custom Build**

The provision of self and custom build is recognised. However, the threshold that at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots is not considered to be justified.

The threshold would result in the number of self and custom build units provided being substantially in excess of the identified need. As stated at paragraph 282, there are only 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The strategic sites identified on the GNLP i.e. those over 1,000 units, would on their own, deliver substantially more than the identified need.

Whilst it is recognised (and welcomed) that the policy includes wording that provision is not required if there is no need, it is suggested that the threshold is increased to a level which better reflects need.

**Change suggested by respondent:****Affordable Housing**

The policy should be revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

**Space Standards**

In the apparent absence of the necessary robust evidence to justify it, the policy should provide some flexibility to recognise need and viability, where necessary.

**Self and Custom Build**

The threshold should be increased, to better reflect the likely need.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24394

Object

**Policy 0132, 0132 Policy**

**Respondent:** Hopkins Homes, Persimmon Homes and Taylor Wimpey [16216]

**Agent:** Bidwells (Mrs Sarah Hornbrook, Associate) [14444]

**Summary:****Introduction**

On behalf of a Consortium of regional and national housebuilders, comprising Persimmon Homes, Hopkins Homes and Taylor Wimpey (hereafter 'the Consortium'), we strongly support the proposed allocation of site GNLP0132 for residential development. As demonstrated during the various Regulation 18 consultations, the site is suitable, available and viable, and capable of delivering a significant quantum of development in a highly sustainable location. The Consortium have an excellent track record of delivery in the area; they are currently on site building out Phase 1 of the wider White House Farm landholding (1,179 dwellings) and have secured a resolution to approve outline planning permission for Phase 2 (up to 456 dwellings), immediately to the east of site GNLP0132. As set out in the draft Statement of Common Ground, the site can be delivered in the Plan Period.

However, whilst the principle of allocating the site for development is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, the detailed wording and requirements of the policy are not sound, as elements are neither effective, justified nor consistent with national policy. Minor alterations to Policy GNLP0132 are therefore sought, to ensure its soundness.

**Quantum of development**

In January 2020, as part of the Regulation 18(C) Consultation, a requirement for the site to demonstrate "the potential for the site to incorporate a well-located High School" was introduced into the wording of Policy GNLP0132. As part of our Regulation 18 (C) Representation, the Consortium confirmed that they were amenable to considering accommodating a secondary school, but at that stage, there had not been sufficient time to fully understand the implications of this on the wider site. A crude estimate of the likely reduction in dwelling numbers had been undertaken, and reduced the likely quantum of development from the 1,350 originally sought,



to 1,200 with the secondary school.

During the summer of 2020, the Consortium continued to engage with Norfolk County Council's Education department on this matter, and NPS, on behalf of the County Council, undertook a feasibility study to identify where within the site it might be possible to accommodate the 12ha school site. Their key requirements were for the site to be as flat as possible, and for the full 12ha to be provided with as few constraints as possible (for instance, avoiding key Green Infrastructure corridors as far as possible). As a result of this, a potential location for the school was identified in the north-eastern corner of the site.

Following this, the Consortium have undertaken a review of the initial high-level Masterplan for the site, that was drawn up in 2017/18 in support of the first Regulation 18 consultation. Reflecting on not only the provision of the school site, but also other consultation responses received during the Regulation 18(C) Consultation, notably those from the Woodland Trust and Norfolk Wildlife Trust, the review of the Masterplan has identified that it may not be possible to deliver 1,200 homes and a secondary school on the site, at an appropriate density. The site is subject to a number of considerations, including buried services/infrastructure, bat corridors crossing the site, and areas of Ancient Woodland, which will influence the scale of development that can be accommodated, and the capacity of the site is likely be closer to 1,000 dwellings. It is therefore considered prudent to reflect this in the policy wording, whilst allowing sufficient flexibility through the use of 'at least' to deliver more than this, should it be possible to achieve this during detailed design. Should the land for the secondary school not be required, then the site will be able to deliver significantly in excess of the 1,000 unit figure.

#### Shared Use of School Sports Provision

During the ongoing discussions with NCC Education that took place in 2020, it was agreed that the sports pitches provided by the school would be made available for community use, and that it would consequently not be necessary for any further sports pitches to be provided within the site to serve the residential development. This agreement was critical to ensuring the continued viability of the site, and fundamental to the Consortium's agreement to consider accommodating the secondary school, as it reduces the impact of the school's land requirement on the developable area of the site by in the region of 5 hectares. Unfortunately, whilst this agreement is reflected in the wording of bullet point 5 of the Policy, bullet point 8 erroneously requires the provision of formal recreation, in the form of sports pitches and childrens' play space, adjacent to the ancient woodland (which is located in the south-eastern corner of the site). In addition to being contrary to the agreed position in relation to sports pitch provision, bullet point 8 is also unnecessary in relation to childrens' play space; the most suitable location for children's play space will be determined through the Masterplanning process. It is assumed that the requirement to locate the formal recreation space adjacent to the ancient woodland is in response to the comments received at Regulation 18 C stage from the Woodland Trust and Norfolk Wildlife Trust, in relation to buffering of Bulmer Coppice. It is considered that bullet point 6 offers adequate protection to the Ancient Woodland, and appropriate buffering, if found to be required based on further consideration of the nature and value of Bulmer Coppice, will be incorporated into the Masterplan for the site.

**Change suggested by respondent:**

Requirement to accommodate strategic infrastructure

In the absence of any more generic wording in the Strategy Document, it is considered that the policy wording should make provision for future consideration of site-specific viability, and the ability to negotiate on matters such as affordable housing and CIL if necessary, if the site is required to provide/accommodate strategic infrastructure, which is required to facilitate the delivery of wider growth aspirations. This approach would be in accordance with Paragraph 34 of the NPPF and Paragraph 005 of the Planning Practice Guide.

In this instance, there is a requirement for this site to accommodate a secondary school that will serve the North-East growth area more widely, far in excess of the requirement to mitigate the impacts of the individual development. Indeed, this is the only site in the Regulation 19 Plan which carries such a requirement. This will, inevitably, impact on the viability of the site, and its ability to deliver a fully policy compliant development. This was recognised in our Regulation 18C Representation, which requested flexibility in relation to affordable housing provision and CIL.

In addition, Anglian Water have indicated that it may be necessary for the site to accommodate a Terminal Pumping Station, to enable the delivery of wider network improvements. Again, even if there is no requirement for the Consortium to fund this infrastructure, it has the potential to impact on the site's viability, by reducing the amount of land available for development.

It is clear from this that the site is critical to the provision of key infrastructure to facilitate the wider growth aspirations for north-east Norwich.

The updated Viability Study that underpins the Regulation 19 Publication does not consider the impact of such matters on the larger strategic sites. In order to ensure soundness, in circumstances where a site is required to provide or accommodate strategic infrastructure, provision should be made for other policy requirements that impact on viability, such as affordable housing, to be negotiated.

Subject to resolution of the matters identified above, the proposed allocation is considered to be sound.

The site is an entirely suitable location for strategic-scale growth, and is deliverable within the Plan period.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24391

Support

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Hopkins Homes, Persimmon Homes and Taylor Wimpey [16216]

**Agent:** Bidwells (Mrs Sarah Hornbrook, Associate) [14444]

### Summary:

The proposed Settlement Hierarchy and the identification of Norwich and the Norwich Fringe as the location to accommodate 66% of the housing growth during the period to 2038 is strongly supported. Norwich and the Norwich Fringe is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing.

The fringe parishes will play a significant role in providing sustainable growth, given their proximity to employment opportunities, services and strategic infrastructure, such as Broadland Northway. In addition, by virtue of its location, the fringe parishes are in close proximity of the countryside providing ease of access to the leisure and recreation opportunities it provides.

The fringe parishes provide opportunities for strategic growth i.e. over 1,000 units. Developments of this scale are capable of providing a wide range of infrastructure improvements, such as schools, employment, health centres and green infrastructure, which will provide benefits to both existing and future residents.

This approach is entirely consistent with paragraph 72 of the NPPF, which advises that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities."

The identification of Sprowston as a location to accommodate significant growth is fully supported.

Sprowston is a highly sustainable location, within the Growth Triangle, and enjoys easy access to strategic employment opportunities, particularly at Broadland Business Park and Norwich Airport Industrial Estate, as well as local employment within Rackheath and Salhouse Road. It also enjoys high quality public transport links into Norwich City Centre, and has a good relationship with the existing services and facilities in the Norwich fringe.

### Change suggested by respondent:

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**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24393

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Hopkins Homes, Persimmon Homes and Taylor Wimpey [16216]**Agent:** Bidwells (Mrs Sarah Hornbrook, Associate) [14444]**Summary:**

The strategic objectives in relation to transport, education, energy, water and health infrastructure are generally supported. However, the Policy is not currently entirely sound, as certain elements are not justified, effective or consistent with national policy.

More specifically, the policy fails to acknowledge that the requirement to accommodate or deliver strategic infrastructure may have implications for the viability of some of the larger strategic sites. For instance, a requirement for an individual site to accommodate a large item of strategic infrastructure, such as a secondary school, which is required to facilitate growth in the wider area, and not just to meet the demand generated by the site itself, is likely to impact on the viability of that particular site in a disproportionate and unfair manner.

Such impacts have not been properly considered or reflected in the Viability Study that underpins the Regulation 19 Plan; this is at odds with paragraph 34 of the NPPF. Paragraph 005 of the Planning Practice Guide makes it clear that it is important to consider the specific circumstances of strategic sites, and that plan makers can undertake site specific viability assessments for sites that are critical to delivering the strategic priorities of the plan, such as sites that enable or unlock other development sites.

**Change suggested by respondent:**

To ensure that strategic infrastructure can be provided through the development of the strategic sites identified in the Local Plan, and that specific sites do not bear a disproportionate burden of infrastructure provision, the policy should be amended to make provision for a reduction in other policy requirements, such as affordable housing, and the potential for CIL exemption, where appropriate, in order to ensure that developments required to deliver strategic infrastructure are viable.

In addition, it is considered that site specific viability appraisals should be undertaken for the strategic sites (1000+ units) to ensure that, notwithstanding the identified infrastructure requirements, the developments are viable, with the option for bespoke policy requirements and CIL arrangements for the sites if necessary. This approach would be in accordance with paragraph 005 of the Planning Practice Guide, and paragraph 34 of the NPPF, and will ensure that the local plan is deliverable over the plan period and, therefore, sound.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23245

Object

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**Policy 0125R, 0125R Policy****Respondent:** Horsham and Newton St Faiths Parish Council (Mr J Graves, Clerk) [13288]**Summary:**

The allocation of dwellings has been raised to 50 from the level under reg. 18 without consultation with the parish council.

Additional dwellings could easily be accommodated with "infill sites" within the settlement boundary.

**Change suggested by respondent:**

N/A

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23406

Object

**Policy SL2007 4016 HFN3, SL2007 4016 HFN3 Policy****Respondent:** Horsham Properties Ltd [16997]**Agent:** Mrs Georgina Brotherton [19554]**Summary:**

The site owners support the inclusion of Policy GNLPSL2007/4061/HNF3 – Land at Abbey Farm Commercial Park for employment uses but object to the proposed allocation area boundary.

Please see LPP letter dated and submitted 9th March 2021 for full details.

**Change suggested by respondent:**

It is requested that two revisions are made to the proposed allocation area.

1. The land immediately to the west of the existing Commercial Park, which currently serves as a bund (approximately 0.65 hectares) and forms part of the proposed development area to extend the Commercial Park, is included within proposed employment site allocation; and
2. The land to the northern section of the Commercial Park measuring 0.75 hectares, known as Block L approved under planning reference 20121385 and now built is removed from the proposed employment allocation as it already forms part of the established Commercial Park.

Please see LPP letter dated and submitted 9th March 2021 for full details.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/44b>

23407

Support

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Horsham Properties Ltd [16997]**Agent:** Mrs Georgina Brotherton [19554]**Summary:**

The site owners support the additional wording included within bullet point 1 of Part 2, which states 'the allocation and retention of smaller scale employment sites across the area, with limited expansion where this can be justified' and consider that it provides sufficient flexibility for existing employment sites, such as Abbey Farm Commercial Park, to undertake future limited expansion if required.

Please see the LPP letter dated and submitted 9th March 2021 for full details.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/44c>

23408

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Horsham Properties Ltd [16997]**Agent:** Mrs Georgina Brotherton [19554]**Summary:**

We support the penultimate paragraph, which now allows for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park. However, we object to the site areas contained within the employment areas table.

Please see the LPP letter dated and submitted 9th March 2021 for full details.

**Change suggested by respondent:**

It is requested that two amendments are made to the table.

1. The land immediately to the west of the existing Commercial Park, which currently serves as a bund (approximately 0.65 hectares) and forms part of the proposed development area to extend the Commercial Park, is included.
2. The land to the northern section of the Commercial Park measuring 0.75 hectares, known as Block L approved under planning reference 20121385 and now built, is excluded to accurately reflect that these buildings form part of the existing Commercial Park and not part of proposed employment allocation GNLPSL2007/4061/HNF3.

Please see the LPP letter dated and submitted 9th March 2021 for full details.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/44d>



23409

Object

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**Horsham St Faith, Settlement Map****Respondent:** Horsham Properties Ltd [16997]**Agent:** Mrs Georgina Brotherton [19554]**Summary:**

We object to the approach applied to settlement boundaries within the draft GNLP, which is currently inconsistent. Within areas falling in South Norfolk District, settlement boundaries are extended to include all proposed allocation sites, however areas within Broadland District exclude proposed allocation sites in the settlement boundaries.

Additionally, the Settlement Map for Horsham and Newton St Faith shows the existing settlement boundary around the majority of Abbey Farm Commercial Park, however does not include the set of industrial buildings known as Block L, the proposed employment land allocation GNLP/SL2007/4061/HNF3, or the western bund.

**Change suggested by respondent:**

We request that a more consistent approach to the preparation of settlement boundaries is applied to the GNLP, in line with the approach currently adopted for sites within South Norfolk District.

We also request the settlement boundary for Horsham and Newton St Faith is amended to include the proposed employment allocation GNLP/SL2007/4061/HNF3, the western bund and Block L.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/44w>

24489

Object

**Policy 1048R, 1048R Policy****Respondent:** Hugh Crane Ltd [19634]**Agent:** Savills (Lydia Voyias, Associate) [16956]**Summary:**

Strong support is given to the identification of Land to the East of Woodbastwick Road, Blofield Heath for allocation of residential development for approximately 20 homes.

The landowners who have promoted this site for delivery have submitted a draft Statement of Common Ground setting out anticipated timescales for delivery at the site based on available data.

Support is also given to the draft policy wording: 'More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints'. The site is supported by a Vision Document and supporting access feasibility statement which demonstrate how the site could accommodate greater than 20 dwellings at the site.

We agree with the proposed policy criteria with the exception of criteria 4.

"4) Protection measures may need to be taken for grass snakes identified on site."

Alternative wording should require a Preliminary Ecological Appraisal and appropriate mitigation having regard to site surveys.

**Change suggested by respondent:**

Alternative wording should require a Preliminary Ecological Appraisal and appropriate mitigation having regard to site surveys.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination

**Attachments:** 22 March 2021 Cover Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4g8465837> - Blofield Heath - Site promotion document - September 2020.pdf - <https://oc2connect.gnlp.org.uk/a/4g9>

Blofield Heath - Highways Feasibility Assessment.pdf - <https://oc2connect.gnlp.org.uk/a/4gv>

23233

Object

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**Policy 0125R, 0125R Policy****Respondent:** Mrs Aileen Hughes [18890]**Summary:**

St Faiths is already under pressure for amenities (school, GP etc) and road traffic with existing footprint plus addition of new homes in Newton St Faith. Building residential properties in proposed area will add to the pressure, whilst detracting from the village feel. Currently St Faiths has separate village identity - building further homes will make the area feel more of a suburb of Norwich, to the detriment of this beautiful semi-rural area. Given the size of the open fields/land around this plot, it is also likely that building here would result in further requests to expand.

**Change suggested by respondent:**

Cancel plans to build further residential homes in St Faiths village.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23601

Object

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**Policy 0378R/2139R, 0378R/2139R Policy****Respondent:** Brian Iles [19883]

**Summary:**

I wish to comment on the proposed development of Acle housing. I have in hand all the papers as published under regulation 19. I also have the copies of the detailed proposals as issued by NCC. These show a proposed road which runs from the South Walsham Rd across the fields to the mini roundabout next to the houses building by Lovells Phase 1. I understand this road is supposed to carry heavy sugarbeat lorries through the site to avoid driving through the village. This proposed road is totally impractical – wearing one of my hats, I am a developer on quite a large scale in both London and Birmingham. I have recently appointed a well known QS to deal with a Birmingham development. A request from me has given me a figure of 2,500 pounds per metre to build a road capable of carrying 42 ton sugarbeat lorries and with a path running beside the road.

I have measured the road length from the proposed drawing using a wheeled calculator. Allowing some small contingencies the cost will be 3 million.

If the road is to be paid out of development funds than at £5000 per house say we would need an additional 600 houses over and above these proposals to pay for the road.

If CIL money is suggested then I would say that we would have sanction 3M to pay for a road in Acle.

We are in the realm of 'Zero Sum Gain' a developer expression to show that the proposal is not viable. The cost outways the advantage.

A short distance in the direction of Norwich we have a road running from the South Walsham Road to the Norwich A47. The 'Windle' built to a high (expensive) standard to carry sugarbeat lorries. The Norwich road end is dangerous. There have been several accidents, some fatal at this junction. A proposal was made to build a filter road at the junction to take traffic towards Acle. This would cost very little and allow big lorries to take the Acle turn off and cross the bridge then filter back onto the A47 and drive to Cantley (the sugar beat factory). I would propose this practical solution to the road problem.

I would also like to mention that the village has not had sufficient communication about the housing scheme. They have not had the opportunity of commenting on the detailed proposals. This is against consultation procedure. I live in Acle. I have represented Acle and district as a County Councillor for 20 years. In addition I was a District Councillor for over ten years. I have strong affiliations with Acle Church and its community. I speak for Acle and its community

**Change suggested by respondent:**

I wish to comment on the proposed development of Acle housing. I have in hand all the papers as published under regulation 19. I also have the copies of the detailed proposals as issued by NCC. These show a proposed road which runs from the South Walsham Rd across the fields to the mini roundabout next to the houses building by Lovells Phase 1. I understand this road is supposed to carry heavy sugarbeat lorries through the site to avoid driving through the village. This proposed road is totally impractical – wearing one of my hats, I am a developer on quite a large scale in both London and Birmingham. I have recently appointed a well known QS to deal with a Birmingham development. A request from me has given me a figure of 2,500 pounds per metre to build a road capable of carrying 42 ton sugarbeat lorries and with a path running beside the road.

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**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23467

Object

**Policy 0596R, 0596R Policy****Respondent:** Anne Inderbitzin [19878]**Summary:**

GNLP0596R – Aylsham Housing Allocation

At the Consultation Meeting in 2018/19 there was mention of one site for an additional 300 houses to be built. Even here the numbers have risen from 300 – 780.

Imagine our surprise and dismay to find another additional site of 250 houses has appeared out of nowhere without consultation with us the residents, or our local councillors or representatives. Corporate bullying and total lack of thought for us all comes to mind.

This makes one question the legality of this being pushed through by the GNLP at an advantageous time for them (Covid 19) without due consultation.

Our infrastructure is already straining under the pressure of recently built homes. The schools are at capacity, doctor surgeries are full, sewage and water systems unable to cope.

We here in Buxton Road have had to call the waterboard out several times due to the stench of sewage systems backing up under the strain. Some residents have sold up and moved on because they were unable to cope. What do you think is going to happen with an additional (unwelcome) 250 houses?

Our roads are already straining to cope and our lovely Market Town is fast losing it's beautiful character.

What is the point of having such meetings, only to be overruled whenever "the powers to be" choose? We feel the GNLP have, with no advance notice, completely disregarded people's and our town council's opinions.

We protest vehemently....

**Change suggested by respondent:**

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**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24240

Object

**Diss, Settlement Map****Respondent:** Inside Land Group Ltd [20053]**Agent:** William Gallagher (Matthew Williams, Company Director) [19988]**Petition:** 2 petitioners**Summary:**

The Part 2 Sites document has been prepared to allocate additional sites to meet the housing requirement identified in Part 1 of the new local plan.

In respect of Diss, Part 1 of the Local Plan makes the following references throughout which should be noted:

- Page 39, Delivery Statement - Housing The plan promotes a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be evidenced.
- Page 176, Housing Growth Needs - The existing commitment (Housing Commitment is sites which are allocated or

have permission for housing development) of housing land at April 2020 is large and shapes the GNLP strategy. The existing allocations, including Site Allocation plans, Area Action Plans and Neighbourhood Plans, derive from the Joint Core Strategy (JCS). These allocations have been demonstrated to be sustainable and, except for later phases of some larger sites where delivery is unlikely before 2038, they are included in this strategy. This deliverable commitment, including uplift on existing allocations and homes delivered since the start of the plan period in April 2018, provides 74% of the total housing growth identified in this plan to 2038.

- Page 48 - Table 6 Establishing the Plan's total housing potential figure - The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded. Uplifts on existing allocations are included here.
- Page 48 - Table 6 Establishing the Plan's total housing potential figure – New allocations are the homes to be provided on new sites allocated through the GNLP (9,254), the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200) and the Diss and area Neighbourhood Plan (250).
- Paragraph 267 - The NPPF states that the Government's objective is to significantly boost the supply of homes. The GNLP addresses this through the housing strategy in policies 1 and 7 and the housing allocations in the Sites document.
- Paragraph 359, Diss - The existing commitment of just over 300 dwellings in April 2018 is complemented by a strategic requirement for an additional 400 homes set by this plan. 150 of these homes are allocated through this plan on a site neighbouring the railway station. Making use of consultation on potential sites undertaken through the GNLP, the Diss and District Neighbourhood Plan will allocate land for the remaining 250 homes.

The above references set a number of key principles:

- Existing allocated sites for housing development within the adopted South Norfolk Local Plan Site Specific Allocations & Policies Document (adopted October 2015) are included within the new Greater Norwich Local Plan (GNLP) as commitments for the purpose of calculating the housing requirement.
- The new GNLP identifies that it will allocate new sites on top of these commitments to exceed the housing requirement thereby offering flexibility within the plan to significantly boost the supply of homes.
- The Part 1 Local Plan is clear that the identified level of growth for Diss (with part of Roydon) between 2018 – 2038 is 763 homes. The existing deliverable commitment for Diss is identified as 363 homes. This figure includes the existing site allocation for DIS3 in the adopted 2015 South Norfolk Site Allocations document.
- Taking into account the existing commitments, there is a need to allocate sites to accommodate 400 new homes.
- 150 of these homes are allocated through the GNLP on a site neighbouring the railway station.
- The final 250 homes are to be allocated through the emerging Diss and District Neighbourhood Plan.

If one then looks at the Part 2 - Publication Draft GNLP Sites Document and the section starting at Paragraph 4.13 in respect of Diss (including part of Roydon), the table at Paragraph 4.14 again identifies the existing local plan allocations which are to be carried over and in turn the need for sites to be found for an addition 250 homes through the emerging neighbourhood plan.

However, Paragraphs 4.20 – 4.22 have been drafted as follows:

- "Paragraph 4.20 - With the exception of one site, decisions on the allocation or reallocation of development land in Diss are devolved to the neighbourhood planning process. The proposed Diss & District Neighbourhood Plan is a cross boundary plan covering parishes located within both the South Norfolk and Mid-Suffolk districts. The parishes included

in the production of the Neighbourhood Plan are: Brome and Oakley, Burston and Shimpling, Diss, Palgrave, Roydon, Scole and Stuston. Progress on the neighbourhood plan is good. During Summer 2020 an Issues and Options consultation took place, and in 2021 the Plan is timetabled to progress towards examination,

referendum, and (if successful) to eventually be 'made' and become part of the adopted Development Plan.

- Paragraph 4.21 - The one allocation to be made in Diss via the GNLP is the Frontier Agriculture site on Sandy Lane. This is an established business that has expressed its long-term ambition to relocate, most likely towards the end of the plan period. The brownfield status of the land along with its proximity to the town centre, railway station, and local bus routes, makes it an exceptional opportunity for higher density brownfield redevelopment. Such brownfield sites are prioritised in national planning policy to make effective use of land, particularly where they are well located in relation to public transport and within walking and cycling distance of a good range of employment, services and facilities.

- Paragraph 4.22 - In addition to existing commitments, a housing requirement of at least 400 new homes is set by the GNLP for the town of Diss, part of which is fulfilled by the allocation of Frontier Agriculture for 150 homes. The Diss & District Neighbourhood Plan will have to fulfil the remaining overall housing requirement, but otherwise has freedom within the statutory framework to make its own choices. In addition to the strategic requirement for 400 new homes, there are three carried forward allocations providing for 122 new homes, 137 homes were delivered April 2018 to March 2020 and a total of 95 additional dwellings with planning permission of 754 homes between 2018-2038. (footnote 2 - For the purposes of calculating housing commitment it is assumed existing allocations from the South Norfolk Site Allocations DPD 2015 will be carried forward, but this is a matter for the Neighbourhood Plan to decide upon This gives a total deliverable housing commitment for Diss (including part of Roydon)."

The above text appears to suggest that the commitments are not actually commitments and could be deallocated if that is what the Neighbourhood Plan chooses to do. This is despite Part 1 of the emerging GNLP clearly stating that the existing allocations are to be carried over thereby leaving the Diss Neighbourhood Plan to find sites for 250 homes only.

This change in approach has been introduced at a late stage in the plan making process and has led to significant confusion and concern not only for our client, but also the preparation of the Neighbourhood Plan.

The background documents to the Diss and District Neighbourhood Plan include the Diss and District Neighbourhood Plan Site Options and Assessment (December 2020) prepared by Aecom which states:

Page 21

"GNLP Diss Draft Site Allocations Document

There are two sites identified as preferred options in Diss providing for 400 new homes. There are three carried forward allocations providing for 87 new homes and a total of 256 additional dwellings with planning permission. This gives a total deliverable housing commitment for Diss (including part of Roydon) of 743 homes between 2018 – 2038 in line with policy 7.2 above. The document then goes on to propose new site allocations at:

- GNLP0102 (Land at Frontier Agriculture Ltd, Sandy Lane, Diss)
- GNLP0250/0342/0119/0291 (land north of the Cemetery, west of Shelfanger Road and East of Heywood Road, Diss)
- DIS 1 Land north of Vince's Road, Diss
- DIS 2 Land off Park Road, Diss
- DIS 3 Land off Denmark Lane, Roydon, Diss
- DIS 8 Land at Station Road/Nelson Road, Diss
- DIS 9 Land at Sandy Lane

and lists the following sites as reasonable alternatives, but states that these are not currently preferred for allocation:



- GNLP0341
- GNLP1045

However, the group have since informed AECOM that SNC have confirmed to them that they now agree for site GNLP1045 to be considered for residential use and therefore the site is now also available for development (it was previously marked as unavailable).

P121

Site is already allocated in Local Plan therefore not appropriate for allocation in Neighbourhood Plan.”

Further to the above, Williams Gallagher contacted Adam Banham (Greater Norwich Local Plan Team) and Mark Thompson (Collective Community Planning – Diss and District Neighbourhood Plan) to discuss the discrepancy between the emerging GNLP and Diss Neighbourhood Plan. Mr Banham and Mr Thompson both confirmed that the apparent change in approach to the inclusion of existing allocated sites in the current regulation 19 consultation document is not correct and would leave DIS3 unallocated in the GNLP by mistake, which is not the intention of either the GNLP or Diss Neighbourhood Plan.

The above clarification is helpful and also welcomed because Inside Land Group has commenced the preparation of a planning application in accordance with the existing DIS3 site allocation. This is in line with the approach to including existing site allocations within the housing supply as put forward during the Regulation 18 consultation and also Part 1 of the current GNLP Regulation 19 consultation. If the discrepancy within Part 2 on the GNLP is not addressed, the delivery of DIS3 could be undermined unnecessarily and would go against the NPPF requirement to significantly boost the supply of homes by potentially deallocating acceptable housing sites. This would be counterintuitive given that DIS3 has already been considered as suitable, available and viable for housing development.

The discrepancy between the GNLP and Diss Neighbourhood Plan allocations must be corrected prior to the GNLP being submitted for examination. This would be addressed by DIS3 being explicitly referenced as an existing allocated site that contributes to the committed housing supply for the purposes of the emerging GNLP and that it is only sites for the additional 250 homes that the Neighbourhood Plan is required to allocate.

If these changes are not made, then the approach to site allocations for Diss would fail the tests of being justified and effective. This is because DIS3 is currently counted towards the housing supply figure, and therefore the deliverability of the plan, but would be inadvertently deallocated resulting in the minimum identified level of development for Diss being less than that set out in Part 1 of the GNLP. The potential error is because Part 2 of the GNLP has taken an unjustified change in approach to Part 1 of the GNLP (and previous Regulation 18 consultation on the Part 2 Site Allocations) and appears to be expecting the Neighbourhood Plan to allocate DIS3 for housing while the Neighbourhood Plan is expecting the GNLP to allocate the site, as has been the accepted approach to date.

**Change suggested by respondent:**

The discrepancy between the GNLP and Diss Neighbourhood Plan allocations must be corrected prior to the GNLP being submitted for examination. This would be addressed by DIS3 being explicitly referenced as an existing allocated site that contributes to the committed housing supply for the purposes of the emerging GNLP and that it is only sites for the additional 250 homes that the Neighbourhood Plan is required to allocate.

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**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

## 24241

## Object

### Diss, Settlement Map

**Respondent:** Inside Land Group Ltd [20053]

**Agent:** William Gallagher (Matthew Williams, Company Director) [19988]

**Petition:** 2 petitioners

#### Summary:

The Part 2 Sites document has been prepared to allocate additional sites to meet the housing requirement identified in Part 1 of the new local plan.

In respect of Diss, Part 1 of the Local Plan makes the following references throughout which should be noted:

- Page 39, Delivery Statement - Housing The plan promotes a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be evidenced.
- Page 176, Housing Growth Needs - The existing commitment (Housing Commitment is sites which are allocated or have permission for housing development) of housing land at April 2020 is large and shapes the GNLP strategy. The existing allocations, including Site Allocation plans, Area Action Plans and Neighbourhood Plans, derive from the Joint Core Strategy (JCS). These allocations have been demonstrated to be sustainable and, except for later phases of some larger sites where delivery is unlikely before 2038, they are included in this strategy. This deliverable commitment, including uplift on existing allocations and homes delivered since the start of the plan period in April 2018, provides 74% of the total housing growth identified in this plan to 2038.
- Page 48 - Table 6 Establishing the Plan's total housing potential figure - The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded. Uplifts on existing allocations are included here.
- Page 48 - Table 6 Establishing the Plan's total housing potential figure – New allocations are the homes to be provided on new sites allocated through the GNLP (9,254), the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200) and the Diss and area Neighbourhood Plan (250).
- Paragraph 267 - The NPPF states that the Government's objective is to significantly boost the supply of homes. The GNLP addresses this through the housing strategy in policies 1 and 7 and the housing allocations in the Sites document.
- Paragraph 359, Diss - The existing commitment of just over 300 dwellings in April 2018 is complemented by a strategic requirement for an additional 400 homes set by this plan. 150 of these homes are allocated through this plan on a site neighbouring the railway station. Making use of consultation on potential sites undertaken through the GNLP, the Diss and District Neighbourhood Plan will allocate land for the remaining 250 homes.

The above references set a number of key principles:

- Existing allocated sites for housing development within the adopted South Norfolk Local Plan Site Specific Allocations

& Policies Document (adopted October 2015) are included within the new Greater Norwich Local Plan (GNLP) as commitments for the purpose of calculating the housing requirement.

- The new GNLP identifies that it will allocate new sites on top of these commitments to exceed the housing requirement thereby offering flexibility within the plan to significantly boost the supply of homes.
- The Part 1 Local Plan is clear that the identified level of growth for Diss (with part of Roydon) between 2018 – 2038 is 763 homes. The existing deliverable commitment for Diss is identified as 363 homes. This figure includes the existing site allocation for DIS1 in the adopted 2015 South Norfolk Site Allocations document.
- Taking into account the existing commitments, there is a need to allocate sites to accommodate 400 new homes.
- 150 of these homes are allocated through the GNLP on a site neighbouring the railway station.
- The final 250 homes are to be allocated through the emerging Diss and District Neighbourhood Plan.

If one then looks at the Part 2 - Publication Draft GNLP Sites Document and the section starting at Paragraph 4.13 in respect of Diss (including part of Roydon), the table at Paragraph 4.14 again identifies the existing local plan allocations which are to be carried over and in turn the need for sites to be found for an addition 250 homes through the emerging neighbourhood plan.

However, Paragraphs 4.20 – 4.22 have been drafted as follows:

- “Paragraph 4.20 - With the exception of one site, decisions on the allocation or reallocation of development land in Diss are devolved to the neighbourhood planning process. The proposed Diss & District Neighbourhood Plan is a cross boundary plan covering parishes located within both the South Norfolk and Mid-Suffolk districts. The parishes included in the production of the Neighbourhood Plan are: Brome and Oakley, Burston and Shimpling, Diss, Palgrave, Roydon, Scole and Stuston. Progress on the neighbourhood plan is good. During Summer 2020 an Issues and Options consultation took place, and in 2021 the Plan is timetabled to progress towards examination,

referendum, and (if successful) to eventually be ‘made’ and become part of the adopted Development Plan.

- Paragraph 4.21 - The one allocation to be made in Diss via the GNLP is the Frontier Agriculture site on Sandy Lane. This is an established business that has expressed its long-term ambition to relocate, most likely towards the end of the plan period. The brownfield status of the land along with its proximity to the town centre, railway station, and local bus routes, makes it an exceptional opportunity for higher density brownfield redevelopment. Such brownfield sites are prioritised in national planning policy to make effective use of land, particularly where they are well located in relation to public transport and within walking and cycling distance of a good range of employment, services and facilities.

- Paragraph 4.22 - In addition to existing commitments, a housing requirement of at least 400 new homes is set by the GNLP for the town of Diss, part of which is fulfilled by the allocation of Frontier Agriculture for 150 homes. The Diss & District Neighbourhood Plan will have to fulfil the remaining overall housing requirement, but otherwise has freedom within the statutory framework to make its own choices. In addition to the strategic requirement for 400 new homes, there are three carried forward allocations providing for 122 new homes, 137 homes were delivered April 2018 to March 2020 and a total of 95 additional dwellings with planning permission of 754 homes between 2018-2038. (footnote 2 - For the purposes of calculating housing commitment it is assumed existing allocations from the South Norfolk Site Allocations DPD 2015 will be carried forward, but this is a matter for the Neighbourhood Plan to decide upon This gives a total deliverable housing commitment for Diss (including part of Roydon).”

The above text appears to suggest that the commitments are not actually commitments and could be deallocated if that is what the Neighbourhood Plan chooses to do. This is despite Part 1 of the emerging GNLP clearly stating that the

existing allocations are to be carried over thereby leaving the Diss Neighbourhood Plan to find sites for 250 homes only.

This change in approach has been introduced at a late stage in the plan making process and has led to significant confusion and concern not only for our client, but also the preparation of the Neighbourhood Plan.

The background documents to the Diss and District Neighbourhood Plan include the Diss and District Neighbourhood Plan Site Options and Assessment (December 2020) prepared by Aecom which states:

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- DIS 9 Land at Sandy Lane

and lists the following sites as reasonable alternatives, but states that these are not currently preferred for allocation:

- GNLP0341
- GNLP1045

However, the group have since informed AECOM that SNC have confirmed to them that they now agree for site GNLP1045 to be considered for residential use and therefore the site is now also available for development (it was previously marked as unavailable).

P121

Site is already allocated in Local Plan therefore not appropriate for allocation in Neighbourhood Plan.”

Further to the above, Williams Gallagher contacted Adam Banham (Greater Norwich Local Plan Team) and Mark Thompson (Collective Community Planning – Diss and District Neighbourhood Plan) to discuss the discrepancy between the emerging GNLP and Diss Neighbourhood Plan. Mr Banham and Mr Thompson both confirmed that the apparent change in approach to the inclusion of existing allocated sites in the current regulation 19 consultation document is not correct and would leave DIS1 unallocated in the GNLP by mistake, which is not the intention of either the GNLP or Diss Neighbourhood Plan.

The above clarification is helpful and also welcomed because Inside Land Group has commenced the preparation of a planning application in accordance with the existing DIS1 site allocation. This is in line with the approach to including existing site allocations within the housing supply as put forward during the Regulation 18 consultation and also Part 1 of the current GNLP Regulation 19 consultation. If the discrepancy within Part 2 on the GNLP is not addressed, the delivery of DIS1 could be undermined unnecessarily and would go against the NPPF requirement to significantly boost the supply of homes by potentially deallocating acceptable housing sites. This would be counterintuitive given that DIS1 has already been considered as suitable, available and viable for housing development.

The discrepancy between the GNLP and Diss Neighbourhood Plan allocations must be corrected prior to the GNLP being

submitted for examination. This would be addressed by DIS1 being explicitly referenced as an existing allocated site that contributes to the committed housing supply for the purposes of the emerging GNLP and that it is only sites for the additional 250 homes that the Neighbourhood Plan is required to allocate.

If these changes are not made, then the approach to site allocations for Diss would fail the tests of being justified and effective. This is because DIS1 is currently counted towards the housing supply figure, and therefore the deliverability of the plan, but would be inadvertently deallocated resulting in the minimum identified level of development for Diss being less than that set out in Part 1 of the GNLP. The potential error is because Part 2 of the GNLP has taken an unjustified change in approach to Part 1 of the GNLP (and previous Regulation 18 consultation on the Part 2 Site Allocations) and appears to be expecting the Neighbourhood Plan to allocate DIS1 for housing while the Neighbourhood Plan is expecting the GNLP to allocate the site, as has been the accepted approach to date.

**Change suggested by respondent:**

The discrepancy between the GNLP and Diss Neighbourhood Plan allocations must be corrected prior to the GNLP being submitted for examination. This would be addressed by DIS1 being explicitly referenced as an existing allocated site that contributes to the committed housing supply for the purposes of the emerging GNLP and that it is only sites for the additional 250 homes that the Neighbourhood Plan is required to allocate.

If these changes are not made, then the approach to site allocations for Diss would fail the tests of being justified and effective. This is because DIS1 is currently counted towards the housing supply figure, and therefore the deliverability of the plan, but would be inadvertently deallocated resulting in the minimum identified level of development for Diss being less than that set out in Part 1 of the GNLP. The potential error is because Part 2 of the GNLP has taken an unjustified change in approach to Part 1 of the GNLP (and previous Regulation 18 consultation on the Part 2 Site Allocations) and appears to be expecting the Neighbourhood Plan to allocate DIS1 for housing while the Neighbourhood Plan is expecting the GNLP to allocate the site, as has been the accepted approach to date.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23335

Object

**Delivery, Delivery Statement****Respondent:** Mr Hugh Ivins [14963]**Summary:**

The document is not sound and the duty to co-operate is non-existent because it fails to take account of local representations regarding the Reepham REP1 proposed allocation which resulted in the largest number of local objections when considered as part of the Broadland Local Plan Site Allocations DPD of 2016.

Additionally REP2 has been superseded by the implementation of Planning Consent 20180963 which has no Market/Affordable Housing element, resulting in a shortfall of housing

**Change suggested by respondent:**

This part of the plan should include a statement that any sites allocated under earlier DPD Site Allocations and not implemented in accordance with the approved requirements and timescale of that Plan should be discarded as they are no longer fit for purpose and were not positively prepared, justified, effective nor compliant with national policy. In which case other proposed allocations need to be revisited.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23338

Support

**Policy 7.3 The Key Service Centres, 371****Respondent:** Mr Hugh Ivins [14963]**Summary:**

While supporting the inclusion of Reepham as a Key Service Centre, it is surprising that no further housing allocations are proposed because the REP2 allocation for 20 houses is no longer possible due to being superseded by the planning consent 20180963.

The REP1 allocation was for 100-120 houses and Sports Hall and is now proposed for 100 houses 'maximum' and Sports Hall. Therefore the current proposal for 141 houses and no Sports Hall is therefore contrary to the Broadland Local Plan and proposed GNLP as well.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23352

Object

**Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets****Respondent:** Mr Hugh Ivins [14963]**Summary:**

The Reepham Assessment is flawed as the Allocations REP1 and REP2 are not in accordance with the requirements under the Broadland adopted Site Allocations DPD of 2016, or proposed GNLP.

REP2 is no longer able to accommodate 20 Market/Affordable homes due to the implementation of planning consent 20180963.

REP1 the current application 20200847 is for 141 houses and no Sports Hall despite the requirement of approximately 100 homes and Sports Hall. There is a current application 20201183 for a completely seperate Sport Hall location in a location where Broadland Planning Officers have indicated that no further building should take place.

**Change suggested by respondent:**

The Allocation REP2 should be discarded as it is no longer 'feasible' or relevant and REP1 should be discarded as it is no longer deliverable or 'fit for purpose'. Other Allocations should be re-examined that were previously supported by Broadland (GNLP0183) for 65-70 dwellings, and the Town Council (GNLP0180) for 35 dwellings. Both these sites would accommodate the required number of houses (100) as required by the GNLP proposals for Reepham. They are well located in the settlement and have satisfactory vehicle access and good footpath links with the Town centre.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23240

Object

**Aylsham, 4.5****Respondent:** Dr Ksenija Ivir-Ashworth [15345]**Summary:**

I do not think it is justified and effective to build such a large number of new homes (550) in a town the size of Aylsham. Shops currently serving the community are clustered around the town centre, with none near one of the newer developments, opposite GNLP0287, for example. Also, the town has an insufficient number of car parking opportunities, considering that commuters park their vehicles in town and take the bus into Norwich.

**Change suggested by respondent:**

Reduce the size of the two developments and improve parking, shopping and health care provision. For example, a Park and Ride facility on either of the two new allocations could be considered. That would reduce the number of cars i) using up parking spaces in town (from prospective shoppers), and ii) reduce commuter traffic volume into Norwich.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24372

Object

**CC4, CC4B Policy****Respondent:** Savills (Edward James, Planner) [19668]**Summary:**

As per our previous representation, we welcome and support site allocation Policy CC4b in principle, however we want to ensure that the contents of the policy is consistent what our client is aiming to build out on site and that correct terminology is used within the policy text.

See attachment for full submission including proposed changes to the policy.

**Change suggested by respondent:**

As per our previous representation, we welcome and support site allocation Policy CC4b in principle, however we want to ensure that the contents of the policy is consistent what our client is aiming to build out on site and that correct terminology is used within the policy text.

See attachment for full submission including proposed changes to the policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 Representation 220321 (Appendix).pdf - <https://oc2connect.gnlp.org.uk/a/4wx>

24373

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Savills (Edward James, Planner) [19668]



**Summary:**

Our previous Regulation 18 representation sought to comment on the sections relation to affordable housing and purpose-built student accommodation (PBSA). In terms of the first bullet point of this policy, we requested that the following wording (underlined) should be added:

“at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing, and subject to viability testing in line with the NPPF”

The revised policy has been re-worked and now includes a section (b) relating to brownfield sites and affordable housing. This states:

“for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage;

- ☒ affordable housing on-site except where exceptional circumstances justify off-site provision;
- ☒ a mix of affordable housing sizes, types, and tenures in agreement with the local authority, taking account of the most up-to-date local evidence of housing need. This will include 10% of the affordable homes being available for affordable home ownership where this meets local needs;
- ☒ affordable housing of at least equivalent quality to the market homes on-site”

We welcome the inclusion of viability text within the policy, however, would request the below amendment on the first bullet point to ensure that the viability testing as referred to within the NPPF is appropriately incorporated into the policy:

“affordable housing on-site except where viability assessments or exceptional circumstances justify offsite provision”;

See attachment for full submission and suggested amendments to the policy.

**Change suggested by respondent:**

See attachment for full submission and suggested amendments to the policy.

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 Representation 220321 (Appendix).pdf - <https://oc2connect.gnlp.org.uk/a/4wx>

## 24374

## Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes**

**Respondent:** Savills (Edward James, Planner) [19668]

**Summary:**

Our previous Regulation 18 representation sought to comment on the 'City Centre' section of the policy and specifically Point 3 specifically Point 3 (Leisure, culture and entertainment and the visitor economy) and Point 5 (The Natural and Built Environment). Our representation stated:

"Point 3 states:

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.

Given that the CC4b site allocation has an existing hotel that will be redeveloped as part of a future scheme, and sits in close proximity to an existing and future transport hub at Norwich Station and its surroundings, we welcome and support the above point.

Point 5 states:

New landmark buildings at the gateways to the city centre will be accepted where they are of exceptional quality and help to define or emphasise the significance of the gateway

We support the encouragement for gateway developments within the city centre in appropriate locations. It is considered that Policy CC4b site allocation is an appropriate location for a landmark building due its strategic location within the City Centre and its proximity to Norwich Train Station. This approach is in line with the principle so the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important"

We welcome that Point 3 has been retained within the revised plan. However, the point relating to landmark buildings has been removed and as referred to above (in Policy CC4b section) we disagree that a landmark reference should not be included within the policy.

Whilst we consider that the our site can include a landmark building and much work has already gone into the development of this with the Council. In terms of the wider City Centre we consider that well-designed landmark buildings should be encouraged and this approach is in line with the principle of the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important places.

See attachment for full submission.

**Change suggested by respondent:**

See attachment for full submission and suggested changes to the policy

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Regulation 19 Representation 220321 (Appendix).pdf - <https://oc2connect.gnlp.org.uk/a/4wx>

23468

Object

**Policy 0596R, 0596R Policy****Respondent:** Tracy Jarman [19879]**Summary:**

I am writing regarding POLICY GNLP0596R – Aylsham Housing Allocation; I am extremely upset at the way the additional 250 houses between Buxton Road and Norwich Road have been added to the plan for Aylsham.

The local infrastructure cannot cope with this addition as it is struggling already - the schools are operating to maximum capacity as are the roads, car parking, doctor surgeries etc. I live at the bottom of Buxton Road and in the summer I cannot even have my windows open because the smell is so bad from the sewage.

Aylsham is a Market Town and should remain as close to that size as it possibly can – the town is a perfect area for tourism and this will fade if more houses are built because we will become a town that people simply want to pass through.

I believe that this allocation has been rushed through GNLP without any thought to the local planning and should therefore be reviewed and reconsidered – this was proposed without public consultation so should not be considered as legal or sound!

**Change suggested by respondent:**

I believe that this allocation has been rushed through GNLP without any thought to the local planning and should therefore be reviewed and reconsidered – this was proposed without public consultation so should not be considered as legal or sound!

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24343

Object

**Policy 0409AR and BR, Policy 0409BR****Respondent:** Jarrold and Sons Ltd [11487]**Agent:** CODE Development Planners Ltd (Miss Helen Adcock, Director) [12557]**Summary:**

Introduction

1.1 These representations are made on behalf of Jarrold & Sons in respect of site Policy GNLP0409BR land south of Barrack Street.

2 Background

2.1 Jarrold & Sons owns land south of Barrack Street and north of the River Wensum stretching from Whitefriars on its western boundary to and including the health and fitness club (currently occupied by Nuffield Health) at its eastern boundary.

2.2 The undeveloped land within Jarrold & Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.

2.3 Jarrold & Sons has worked tirelessly over many years to attract inward investment into this part of the city. Completion of buildings between St James Mill and Whitefriars (1 St James Court and Carmelite House) fulfilled

Jarrold's first office led investment objective. The next phase of Jarrold's redevelopment strategy required a package of elements to create a unique selling point in order to attract office occupiers to this area of the city. The concept of offices on the river frontage, views to Norwich Cathedral, links via a new bridge (the purpose built and forward funded Jarrold Bridge) and car parking, all contribute to the unique selling point. These have led to the construction and occupation of Kingfisher House and Dragonfly House adjacent to the river in the south east of the wider site and 3 St James Court adjacent to the Puppet Theatre in the north west of the wider site.

### 3 Status of latest planning permissions for areas within proposed allocation GNLP0409BR

3.1 08/00538/RM - Part Condition 2: (plots F1 and F2) layout, scale, appearance and landscaping (including 2c: materials; part 2d: car parking; 2h: typical doors and windows) for 8,079sqm office space (B1) comprising 198sqm of ancillary retail space (reserved matters application in respect of outline consent 06/00724/F) was approved on 5 September 2008.

3.2 Correspondence between Norwich City Council (NCC) and the then agents for the proposals for plots F1 and F2 establish that lawful commencement has taken place and therefore permission is in perpetuity. However, some years have passed since and whilst Jarrold & Sons has been actively marketing the site the proposal has not been progress towards completion.

3.3 15/01927/O - Outline application with all matters reserved for the erection of up to 200 dwellings, together with public open space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces was approved on 12 August 2016. Reserved matters were not submitted within three years of the planning permission being granted and consequently the permission has lapsed.

3.4 The residential market is very different from when the design of the area east of the City Wall was conceived in 2006 (hybrid planning permission 06/00724/F granted on 21 March 2007); combining car parking for office tenants within the residential blocks is no-longer attractive to the market. Therefore, any allocation needs to include flexibility for a multi-storey car park to provide car parking for use by tenants of office accommodation within a specified area. Such an approach would acknowledge the historic and current use of a large area of surface car park and the mechanisms that have been incorporated into various planning permissions, which acknowledge a quantum of car parking for the sole use of tenants of the following office accommodation: St James' Mill; 1 St James' Court (Mills & Reeve); 2 St James Court (Carmelite House); 3 St James' Court; Zone F, Dragonfly House and Kingfisher House.

### 4 Soundness of proposed policy GNLP0409BR

4.1 Paragraph 35 of the National Planning Policy Framework (NPPF) states that, "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."

4.2 Jarrold & Sons contends that the current wording of Policy GNLP0409BR would render the Greater Norwich Local Plan (GNLP) unsound on the following grounds.

#### 4.3 Mix of uses and quantum

4.3.1 The current wording of the proposed GNLP0409BR allocation states, "Land south of Barrack Street (approx. 2.17 hectares) is allocated for residential-led mixed-use development. This will include a minimum of 200 homes. Offices and managed workspace, ancillary retail and professional uses, restaurants, cafes and bars, and recreational open space will be accepted as part of a balanced mix of uses." However, there is no evidence provided by the GNLP authorities which demonstrates that a mixed use development is viable and deliverable and thus it fails the "effective" test. Equally there is no evidence to demonstrate that this is the most appropriate strategy or why the alternative wording proposed by Jarrold & Sons (representations in response to Regulation 18C dated 16 March 2020) are not reasonable.

4.3.2 As referenced in paragraph 2.3 above Jarrold & Sons has worked tirelessly over many years to attract inward investment into this part of the City of Norwich. It represents an important opportunity to redevelop a brownfield site in a prominent location within Norwich. Jarrold & Son contend that due to the context of the remaining area of land available for development the land use is less important than the quality of development and that the remaining areas are developed.

4.3.3 There are easier sites to develop for either employment or residential uses within the GNLP area, and therefore policy restrictions which specify a use or that the uses should be mixed when there is no evidence for this, renders the GNLP unsound (it is not justified or effective). The GNLP0409BR allocation as currently worded undermines other policies within the GNLP. For example, policy 1 of the GNLP – The sustainable growth strategy, whereby “Growth is distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure. It is provided through urban and rural regeneration, along with sustainable urban and village extensions. Most of the housing, employment and infrastructure growth is focussed in the Strategic Growth Area illustrated on the Key Diagram. This includes Greater Norwich’s part of the Cambridge Norwich Tech Corridor, including the Norwich urban area . . . .”

4.3.4 Without suitable mechanisms to support city centre development it is unlikely growth will follow the distribution set out in the settlement hierarchy as outlined in GNLP policy 1 or that the GNLP will deliver the 30.8ha of city centre employment sites as outlined in GNLP policy 6: The economy.

4.3.5 Supporting text at paragraph 293 of the GNLP: Strategy document offers support for the principle of office development in the city centre. Paragraph 294 states “The report [Employment Town Centre and Retail Study (GVA 2017) and the Avison Young 2020 addendum] highlights key trends in employment activity including a re-urbanisation of business activity back to locations that can offer a broader range of services to employees, and the rise of in new start-ups in the creative and media sector which is fuelling demand for space in specific locations allowing for greater interactions including Norwich City Centre. Given that the report also identifies an underlying demand for good quality office and employment space there is a risk that this may lead to new such development going to less sustainable locations with serious impacts on the vitality of the city centre . . . .” Paragraph 295 of the Strategy explains “A key part of retaining and growing employment in the city centre will be to reverse the loss of office accommodation in the city centre, as required by policy 1 of this plan, which has experienced a 29% reduction since the start of the Joint Core Strategy plan period in 2008”.

4.3.6 Variations in parking standards across the three local authorities, and the resultant uneven playing field has likely contributed to the loss of city centre office accommodation and its relocation to sites such as Broadland Business Park. The discrepancy between parking standards within Norwich city centre and Broadland is notable with class B1 development in Broadland able to provide up to six times the level of on-site car parking permitted in the city centre.

4.3.7 However, evidence in the Employment, Town Centre and Retail study (GVA 2017), updated in the Greater Norwich Employment Land addendum (Avison Young 2020), demonstrates that committed employment land is more than sufficient in quantity and quality to meet the potential for enhanced growth. While the plan provides for significantly more employment land than is required for the scale of jobs growth, it states a range of justifying factors (paragraph 289 of GNLP Strategy document). Whilst it is acknowledged that some sites are more suited to specific types of future employment than others the report points to multiple site clusters suited to office based employment such as professional, business and financial services and digital and tech industries including the Norwich city centre but also Broadland Business Park. In the situation where supply far outstrips demand potential tenants have ample opportunity to identify multiple suitable sites in search of not only their specific requirements but also prices, rates and the provision of on-site facilities such as car parking.

4.3.8 Without support from policy, Jarrolds & Sons feels that as paragraph 294 of the GNLP: Strategy document explains “Given that the report also identifies an underlying demand for good quality office and employment space there is a risk that this may lead to new such development going to less sustainable locations with serious impacts on the vitality of the city centre and undermining policies to encourage modal shift.). Therefore, to avoid being found unsound the GNLP, through a combination of carrot and stick policies, needs to ensure that high density employment uses are concentrated in locations aligned to the growth/settlement hierarchy otherwise market forces will continue to direct office development away from the city centre. The rhetoric in the currently worded GNLP does not appear to lead to allocations which reflect a greater Norwich philosophy, instead there remains strategic tension between the locations which have historically been the singular focus of each of the authorities when acting individually. Unless the GNLP addresses the conflict within its documents and evidence base it fails the tests of soundness.

4.3.9 Policy 7.1 addresses specific issues relating to Norwich city centre and a specific paragraph on the economy

states, "to ensure a strong employment base, development should provide a range of floorspace, land and premises as part of mixed-use developments. Development should promote more intensive use of land to meet identified needs for start-up and grow-on space for small and medium sized enterprises including the digital creative industries, technology, financial and cultural and leisure services clusters." This does little to promote the development of office facilities in the city centre when considered against the alternative options. Jarrold & Sons feels that simply because policy specifies office space it does not mean that it will come forward and there has been little evidence produced to suggest otherwise.

## 5 Parking

5.1 The Norwich Development Management Policies Local Plan, December 2014 (NDMPLP) contains the car parking standards for specific development uses across various city locations. Of interest to the site at Barrack Street are use classes B1 office and C2 residential (pre-2020). Located in the City Centre Parking Area the maximum allowance for parking for class B1 office development is one space per 200m<sup>2</sup> and for residential one parking space per dwelling. Broadland Business Park is within the administrative area of Broadland District Council and as such is subject to different parking standards. When these standards are compared the contrast is stark. Detailed in the Parking Standards SPD (2007) the maximum standard for class B1 development is one space per 30m<sup>2</sup> gross floor area. This makes Broadland Business Park highly attractive to potential tenants. In terms of residential provision, the minimum standard is one space per dwelling and up to two spaces for three bed dwellings.

5.2 Until this imbalance is addressed through the inclusion of specific policies, the Strategy of the GNLP is unsound as there is no evidence that the Strategy will facilitate the delivery of city centre development and therefore be in compliance with Policy 7.1 which states "Norwich city centre's strategic role as key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high-density mix of employment, housing, leisure and other uses."

5.3 Jarrold & Sons contends that specific parking provisions should be included within the policy allocations for the area covered by the suggested policy allocations map (drawing 8436-FM-DR-2001-A00). 180 car park spaces for the sole use of tenants of office accommodation within St James Place and Gilders Way office developments. This figure is arrived at to accommodate the 127 residual car parking spaces as part of Condition 10 15/01927/O and the 53 spaces as part of the design of area F.

## 6 Policy map amendment

6.1 The area of the proposed allocation does not reflect the up to date position in relation to extant planning permission 08/00538/RM (refer to paragraph 3.1 above) and therefore needs to be updated.

6.2 Table G.1.1 on page G3 of Appendix G of the SA states as the reasons for the mix of uses of policy GNLP0409BR as inter alia, "This key regeneration site in the city centre is long term vacant. . . . Outline and detailed consents on this site provide for 200 homes . . ." It goes on to state, "The allocated site is expected to deliver an equal number of homes to the existing consent although it is understood that this may come forward through a revised application for the site."

6.3 The assessment is inaccurate and misleading; there are no extant or detailed consents on the site relating to residential development. The fact that part of planning permission 06/00724/F granted in March 2007, has been followed by subsequent planning permissions for 200 new homes, and that all have elapsed emphasizes Jarrold & Sons concerns that policy GNLP0409BR which specifies the site is "allocated for residential-led mixed-use development. This will include a minimum of 200 homes." is not justified and history has proven is not effective. It therefore fails the tests of soundness.

6.4 Table G.1.1 on page G3 of Appendix G of the SA also states in respect of policy GNLP0409BR that, "Alternative versions of this site have been considered through the assessment process – see unallocated sites table." However, the reasonable alternative submitted by Jarrold & Sons to the Regulation 18c GNLP plan does not appear to be considered.

**Change suggested by respondent:**

7 Modifications required to the GNLP

(see attached representation for easier to read modified policy)

7.1 Jarrold & Sons contends the in order for the GNLP team to remedy the failure of the Regulation 19 GNLP to satisfy the tests of soundness the following modifications are required. The deletion of a specified number of homes removes the failings of the GNLP against the 'justified' and 'effective' tests of soundness. Other amendments have been made to remove inaccurate wording/ambiguity.

Policy GNLP0409BR Land south of Barrack Street (approx. 2.17 hectares) is allocated for residential-led mixed-use development. Homes (including residential care homes and elderly persons accommodation), This will include a minimum of 200 homes. Offices and managed workspace, ancillary retail and professional uses, restaurants, cafes and bars, and recreational open space will be accepted as part of a balanced mix of uses. The development will achieve the following site-specific requirements: 1. Achievement of a high quality, locally distinctive design of a scale and form which respects and takes advantage of its riverside context and location adjacent to the City Centre Conservation Area. 2. Proposals will provide a suitable setting for designated heritage assets affected by the proposals on and off site including key views from and into the site in particular the significant long views across the site towards Norwich Cathedral. 3. Ensures a high level of flood resilience and incorporates appropriate flood mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding); 4. The office element of the scheme should be located to extend and consolidate the existing completed phases of the St James' Place development at Gilders Way; 5. Provision of integral and well-designed parking areas to serve existing offices at Gilders Way, St James' Court and St James' Mill and St James' Place as well as proposed office users together with segregated areas of residents parking (this could include a private multistorey car park). Car free or low-car housing development in accordance with Policy 2 is appropriate in this location. 6. Incorporates views across, from and of the river. Retain the existing embankment line and historic features. Enhancement of river access including provision for the extension and maintenance of the riverside walk in accordance with policy 7.1 and the 'River Wensum Strategy'. The establishment and improvement of pedestrian and cycle routes north-south across the site from Jarrold Bridge to Barrack Street and improve east-west links to connect with the existing cycle network. 7. A noise impact assessment and air quality assessment will be required, and the development must be designed to mitigate the impact of noise from the main road. 8. High quality landscaping, planting and biodiversity enhancements including protection of trees along the river edge; 9. Provision of public realm enhancements including the provision of open space and playspace of an appropriate form and character for the enjoyment of residents and visitors; 10. Protection of bankside access for maintenance purposes. 11. Vehicular access should be from Barrack Street via Gilders Way.

Policy Map GNLP0409BR to identify 'commitment' for the area of the site covered by extant planning permission 08/00538/RM for 8,079sqm office space (B1) comprising 198 sqm of ancillary retail space

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Rep - <https://oc2connect.gnlp.org.uk/a/4df>

## 24348

## Object

### Policy HEL1, HEL1 Policy

**Respondent:** Jarrold and Sons Ltd [11487]

**Agent:** CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]

**Summary:**

Please see attachment for details of full representation.

These representations are submitted on behalf of Jarrolds & Sons the owners of land to the rear of Heath Crescent (identified in the Greater Norwich Local Plan (GNLP) evidence base documents as site GNLP2173). The site is bound to the north by Fifers Lane, an industrial estate to the east and residential dwellings along Heath Crescent and Prince Andrew's Road to the west, and Prince Andrew's Close to the south.

The site at Heath Crescent has been assessed in the GNLP Site Assessment: Norwich and Urban Fringe - Hellesdon Booklet as a reasonable alternative site for residential development (reference GNLP2173).

**4 Conclusions**

4.1 Jarrold & Sons also considers the GNLP fails the test of soundness when assessing whether it is justified. In order to be justified the plan should be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. There is insufficient evidence to justify decisions in the GNLP. Decisions that have been made are based on

inaccurate and misleading information.

4.2 These representations demonstrate that the GNLP is not legally compliant and fails the tests of soundness.

4.3 Currently the GNLP seeks in part to delegate decisions regarding the spatial representation of the infrastructure requirements to support growth, principally sport, recreation and open space designations, to the development management DPDs. However, this fails the tests of soundness as it has impacted the GNLPs policy justifications and effectiveness. Furthermore, it does not provide a strategy which seeks to meet the areas needs consistent with achieving sustainable development; the residential allocations are not supported by an up to date assessment of the need for sport, recreation and open space. The GNLP is therefore not positively prepared.

4.4 In order to remedy this the SA needs to be amended and reassess strategy and site allocation policies. The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment. These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Change suggested by respondent:**

- a) In order to remedy the legal failings the SA needs to be amended and reassess strategy and site allocation policies.
- b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment.
- c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Representation Form - <https://oc2connect.gnlp.org.uk/a/4dz>  
 001 171214 DrwLP-1-100\_RedLine.pdf - <https://oc2connect.gnlp.org.uk/a/4dm>  
 Transport Appraisal - <https://oc2connect.gnlp.org.uk/a/4dn>  
 Preliminary Landscape & Visual Overview - <https://oc2connect.gnlp.org.uk/a/4dy>  
 ECOLOGY - <https://oc2connect.gnlp.org.uk/a/4dp>  
 PRELIMINARY HIGHWAY SURFACE WATER DRAINAGE STRATEGY - <https://oc2connect.gnlp.org.uk/a/4dq>  
 Initial Site Noise Risk Assessment - <https://oc2connect.gnlp.org.uk/a/4wr>  
 ARCHAEOLOGICAL DESK-BASED ASSESSMENT - <https://oc2connect.gnlp.org.uk/a/4ws>  
 Arboricultural Assessment - <https://oc2connect.gnlp.org.uk/a/4wt>



009 200220 DrwFL-1-100A.pdf - <https://oc2connect.gnlp.org.uk/a/4w3>

010 200220 DrwFL-1-101B.pdf - <https://oc2connect.gnlp.org.uk/a/4w4>

011 201216 GNLPTeam\_clarification.pdf - <https://oc2connect.gnlp.org.uk/a/4w5>

013 200924 GNGB\_Agnd\_Inc\_Apndx1.pdf - <https://oc2connect.gnlp.org.uk/a/4w7>

## 24349

## Object

### Costessey Contingency Site, 0581 2043 Policy

**Respondent:** Jarrold and Sons Ltd [11487]

**Agent:** CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]

#### Summary:

Please see attachment for details of full representation.

These representations are submitted on behalf of Jarrolds & Sons the owners of land to the rear of Heath Crescent (identified in the Greater Norwich Local Plan (GNLP) evidence base documents as site GNLP2173). The site is bound to the north by Fifers Lane, an industrial estate to the east and residential dwellings along Heath Crescent and Prince Andrew's Road to the west, and Prince Andrew's Close to the south.

The site at Heath Crescent has been assessed in the GNLP Site Assessment: Norwich and Urban Fringe - Hellesdon Booklet as a reasonable alternative site for residential development (reference GNLP2173).

#### 4 Conclusions

4.1 Jarrold & Sons also considers the GNLP fails the test of soundness when assessing whether it is justified. In order to be justified the plan should be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. There is insufficient evidence to justify decisions in the GNLP. Decisions that have been made are based on

inaccurate and misleading information.

4.2 These representations demonstrate that the GNLP is not legally compliant and fails the tests of soundness.

4.3 Currently the GNLP seeks in part to delegate decisions regarding the spatial representation of the infrastructure requirements to support growth, principally sport, recreation and open space designations, to the development management DPDs. However, this fails the tests of soundness as it has impacted the GNLPs policy justifications and effectiveness. Furthermore,

it does not provide a strategy which seeks to meet the areas needs consistent with achieving sustainable development; the residential allocations are not supported by an up to date assessment of the need for sport, recreation and open space. The GNLP is therefore not positively prepared.

4.4 In order to remedy this the SA needs to be amended and reassess strategy and site allocation policies. The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment. These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

#### Change suggested by respondent:

- a) In order to remedy the legal failings the SA needs to be amended and reassess strategy and site allocation policies.
- b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment.
- c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Representation Form - <https://oc2connect.gnlp.org.uk/a/4dz>  
 001 171214 DrwLP-1-100\_RedLine.pdf - <https://oc2connect.gnlp.org.uk/a/4dm>  
 Transport Appraisal - <https://oc2connect.gnlp.org.uk/a/4dn>  
 Preliminary Landscape & Visual Overview - <https://oc2connect.gnlp.org.uk/a/4dy>  
 ECOLOGY - <https://oc2connect.gnlp.org.uk/a/4dp>  
 PRELIMINARY HIGHWAY SURFACE WATER DRAINAGE STRATEGY -  
<https://oc2connect.gnlp.org.uk/a/4dq>  
 Initial Site Noise Risk Assessment - <https://oc2connect.gnlp.org.uk/a/4wr>  
 ARCHAEOLOGICAL DESK-BASED ASSESSMENT - <https://oc2connect.gnlp.org.uk/a/4ws>  
 Arboricultural Assessment - <https://oc2connect.gnlp.org.uk/a/4wt>  
 009 200220 DrwFL-1-100A.pdf - <https://oc2connect.gnlp.org.uk/a/4w3>  
 010 200220 DrwFL-1-101B.pdf - <https://oc2connect.gnlp.org.uk/a/4w4>  
 011 201216 GNLPteam\_clarification.pdf - <https://oc2connect.gnlp.org.uk/a/4w5>  
 013 200924 GNGB\_Agnd\_Inc\_Apndx1.pdf - <https://oc2connect.gnlp.org.uk/a/4w7>

24350

Object

## Site Assessment Booklets and Studies, Sustainability Appraisal Report

**Respondent:** Jarrold and Sons Ltd [11487]

**Agent:** CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]

### Summary:

Please see attachment for details of full representation.

These representations are submitted on behalf of Jarrolds & Sons the owners of land to the rear of Heath Crescent (identified in the Greater Norwich Local Plan (GNLP) evidence base documents as site GNLP2173). The site is bound to the north by Fifers Lane, an industrial estate to the east and residential dwellings along Heath Crescent and Prince Andrew's Road to the west, and Prince Andrew's Close to the south.

The site at Heath Crescent has been assessed in the GNLP Site Assessment: Norwich and Urban Fringe - Hellesdon Booklet as a reasonable alternative site for residential development (reference GNLP2173).

### 4 Conclusions

4.1 Jarrold & Sons also considers the GNLP fails the test of soundness when assessing whether it is justified. In order to be justified the plan should be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. There is insufficient evidence to justify decisions in the GNLP. Decisions that have been made are based on inaccurate and misleading information.

4.2 These representations demonstrate that the GNLP is not legally compliant and fails the tests of soundness.

4.3 Currently the GNLP seeks in part to delegate decisions regarding the spatial representation of the infrastructure requirements to support growth, principally sport, recreation and open space designations, to the development management DPDs. However, this fails the tests of soundness as it has impacted the GNLPs policy justifications and effectiveness. Furthermore,

it does not provide a strategy which seeks to meet the areas needs consistent with achieving sustainable development; the residential allocations are not supported by an up to date assessment of the need for sport, recreation and open space. The GNLP is therefore not positively prepared.

4.4 In order to remedy this the SA needs to be amended and reassess strategy and site allocation policies. The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment. These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Change suggested by respondent:**

- a) In order to remedy the legal failings the SA needs to be amended and reassess strategy and site allocation policies.
- b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment.
- c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Representation Form - <https://oc2connect.gnlp.org.uk/a/4dz>  
 001 171214 DrwLP-1-100\_RedLine.pdf - <https://oc2connect.gnlp.org.uk/a/4dm>  
 Transport Appraisal - <https://oc2connect.gnlp.org.uk/a/4dn>  
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 ECOLOGY - <https://oc2connect.gnlp.org.uk/a/4dp>  
 PRELIMINARY HIGHWAY SURFACE WATER DRAINAGE STRATEGY -  
<https://oc2connect.gnlp.org.uk/a/4dq>  
 Initial Site Noise Risk Assessment - <https://oc2connect.gnlp.org.uk/a/4wr>  
 ARCHAEOLOGICAL DESK-BASED ASSESSMENT - <https://oc2connect.gnlp.org.uk/a/4ws>  
 Arboricultural Assessment - <https://oc2connect.gnlp.org.uk/a/4wt>  
 009 200220 DrwFL-1-100A.pdf - <https://oc2connect.gnlp.org.uk/a/4w3>  
 010 200220 DrwFL-1-101B.pdf - <https://oc2connect.gnlp.org.uk/a/4w4>  
 011 201216 GNLPteam\_clarification.pdf - <https://oc2connect.gnlp.org.uk/a/4w5>  
 013 200924 GNGB\_Agnd\_Inc\_Apndx1.pdf - <https://oc2connect.gnlp.org.uk/a/4w7>

## 24351

## Object

### Hellesdon, Settlement Map

**Respondent:** Jarrold and Sons Ltd [11487]

**Agent:** CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]

**Summary:**

Please see attachment for details of full representation.

These representations are submitted on behalf of Jarrolds & Sons the owners of land to the rear of Heath Crescent (identified in the Greater Norwich Local Plan (GNLP) evidence base documents as site GNLP2173). The site is bound to the north by Fifers Lane, an industrial estate to the east and residential dwellings along Heath Crescent and Prince Andrew's Road to the west, and Prince Andrew's Close to the south.

The site at Heath Crescent has been assessed in the GNLP Site Assessment: Norwich and Urban Fringe - Hellesdon Booklet as a reasonable alternative site for residential development (reference GNLP2173).

**4 Conclusions**

4.1 Jarrold & Sons also considers the GNLP fails the test of soundness when assessing whether it is justified. In order to be justified the plan should be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. There is insufficient evidence to justify decisions in the GNLP. Decisions that have been made are based on

inaccurate and misleading information.

4.2 These representations demonstrate that the GNLP is not legally compliant and fails the tests of soundness.

4.3 Currently the GNLP seeks in part to delegate decisions regarding the spatial representation of the infrastructure requirements to support growth, principally sport, recreation and open space designations, to the development management DPDs. However, this fails the tests of soundness as it has impacted the GNLPs policy justifications and effectiveness. Furthermore, it does not provide a strategy which seeks to meet the areas needs consistent with achieving sustainable development; the residential allocations are not supported by an up to date assessment of the need for sport, recreation and open space. The GNLP is therefore not positively prepared.

4.4 In order to remedy this the SA needs to be amended and reassess strategy and site allocation policies. The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment. These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Change suggested by respondent:**

- a) In order to remedy the legal failings the SA needs to be amended and reassess strategy and site allocation policies.
- b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment.
- c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Representation Form - <https://oc2connect.gnlp.org.uk/a/4dz>  
 001 171214 DrwLP-1-100\_RedLine.pdf - <https://oc2connect.gnlp.org.uk/a/4dm>  
 Transport Appraisal - <https://oc2connect.gnlp.org.uk/a/4dn>  
 Preliminary Landscape & Visual Overview - <https://oc2connect.gnlp.org.uk/a/4dy>  
 ECOLOGY - <https://oc2connect.gnlp.org.uk/a/4dp>  
 PRELIMINARY HIGHWAY SURFACE WATER DRAINAGE STRATEGY - <https://oc2connect.gnlp.org.uk/a/4dq>  
 Initial Site Noise Risk Assessment - <https://oc2connect.gnlp.org.uk/a/4wr>  
 ARCHAEOLOGICAL DESK-BASED ASSESSMENT - <https://oc2connect.gnlp.org.uk/a/4ws>  
 Arboricultural Assessment - <https://oc2connect.gnlp.org.uk/a/4wt>

009 200220 DrwFL-1-100A.pdf - <https://oc2connect.gnlp.org.uk/a/4w3>

010 200220 DrwFL-1-101B.pdf - <https://oc2connect.gnlp.org.uk/a/4w4>

011 201216 GNLPTeam\_clarification.pdf - <https://oc2connect.gnlp.org.uk/a/4w5>

013 200924 GNGB\_Agnd\_Inc\_Apndx1.pdf - <https://oc2connect.gnlp.org.uk/a/4w7>

## 23557

## Object

### Hingham, 5.37

**Respondent:** Mrs Zoe Jones [19906]

#### Summary:

It is impossible to see how the plans will avoid a serious impact on the biodiversity of the town. The planned homes on the Norwich road are on a site that is rich with wildlife and very close to an area of Specific Scientific interest. The planned 80 homes will have a negative impact both in their building and by bringing more cars and other detrimental factors to Hingham.

The Seamere Road area nearby has also been prone to flooding in the past and it is likely that new homes on the Norwich Road site will negatively impact this.

#### Change suggested by respondent:

The Norwich Road site should not be included in the plans. Another large development of this size is not suitable for Hingham and this site in particular should not be considered because of the negative impacts mentioned above.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

## 24340

## Object

### Policy 7.4 Village Clusters, Policy 7.4 Village Clusters

**Respondent:** JR Cozens Wiley Ltd [20065]

**Agent:** La Ronde Wright (Lewis Matthews) [16578]

**Petition:** 2 petitioners

**Summary:**

Policy 7.4 is considered to be unjustified, ineffective, inconsistent with national policy and not positively prepared due to the restrictive nature of the policy and its ultimate undermining of the vitality of village clusters.

Policy 7.4 states that small scale employment uses will be acceptable in principle within development boundaries. This is permitted through the reuse of rural buildings or through the potential expansion of existing employment sites. However, policy 7.4 does not mention development that is adjacent to, or relates well to development boundaries. As such, the policy is considered to be overly restrictive, not allowing for the realistic or growth and expansion of employment uses. As such the policy is considered to be detrimental to rural economies which rely upon local jobs for local people and localised footfall to sustain existing service provision. As such, the policy is inconsistent with national policy, namely paragraphs 83 and 84 of the NPPF and ultimately, paragraph 35.

Looking at the impact that COVID-19 has had upon the working environment, there are new pressures upon employers to provide sites that can adhere to principles such as social distancing. Additionally, employers are looking for more flexible arrangements for employees, such as utilising smaller office spaces and capitalising upon the ability to work from home. As such the proliferation of small office spaces across the district would help aid rural economies, and by being small in nature, would not undermine the larger allocations within the plan. Additionally, given the rise in new home-based businesses, smaller workspaces and offices are seeing an increased demand at the expense of larger more industrial units and sites. Policy 7.4 does not acknowledge or address this trend, and instead is considered to be unjustified and ineffective.

As such, it is considered that the current plan is not positively prepared as it does not adequately address the radical change in employment practices of the previous year. Coupling this with the overly restrictive policy, it is considered that the proposed plan will have a detrimental impact upon rural economies whilst protecting antiquated employment strategies. It is therefore considered that the GNLP is not compliant with national policies and the aspiration to support and facilitate rural economies and therefore is considered in conflict with paragraph 35 of the NPPF.

**Change suggested by respondent:**

It is considered necessary that a more flexible approach to this policy with regard to facilitating employment generating development in more rural locations be adopted. Furthermore, it is also considered prudent that further assessment of need and trends in relation to employment and business practices is carried out. The policy should also cater to the rise in need of small business and office spaces as well as the need for more sites in better locations where amenities such as public open space is available for employees, mirroring the current trend and protecting and enhancing employee welfare.

If this route is not pursued, an alternative could be to allocate small sites in rural locations. For example, looking at Little Plumstead, we can see that there are local facilities, and sustainable transport options available to local people. As such, it is considered that an allocation for a small extension to the existing Octagon business park would cater to the needs of local residents within close proximity and future employers. Allocation GNLP2107 is considered to be an ideal village allocation which would accord with paragraph 83 and would supplement the sustainable growth and expansion of Little Plumstead whilst providing a localised benefits.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

## Great and Little Plumstead, Settlement Map

**Respondent:** JR Cozens Wiley Ltd [20065]

**Agent:** La Ronde Wright (Lewis Matthews) [16578]

**Petition:** 2 petitioners

### Summary:

Policy 7.4 is considered to be unjustified, ineffective, inconsistent with national policy and not positively prepared due to the restrictive nature of the policy and its ultimate undermining of the vitality of village clusters.

Policy 7.4 states that small scale employment uses will be acceptable in principle within development boundaries. This is permitted through the reuse of rural buildings or through the potential expansion of existing employment sites. However, policy 7.4 does not mention development that is adjacent to, or relates well to development boundaries. As such, the policy is considered to be overly restrictive, not allowing for the realistic or growth and expansion of employment uses. As such the policy is considered to be detrimental to rural economies which rely upon local jobs for local people and localised footfall to sustain existing service provision. As such, the policy is inconsistent with national policy, namely paragraphs 83 and 84 of the NPPF and ultimately, paragraph 35.

Looking at the impact that COVID-19 has had upon the working environment, there are new pressures upon employers to provide sites that can adhere to principles such as social distancing. Additionally, employers are looking for more flexible arrangements for employees, such as utilising smaller office spaces and capitalising upon the ability to work from home. As such the proliferation of small office spaces across the district would help aid rural economies, and by being small in nature, would not undermine the larger allocations within the plan. Additionally, given the rise in new home-based businesses, smaller workspaces and offices are seeing an increased demand at the expense of larger more industrial units and sites. Policy 7.4 does not acknowledge or address this trend, and instead is considered to be unjustified and ineffective.

As such, it is considered that the current plan is not positively prepared as it does not adequately address the radical change in employment practices of the previous year. Coupling this with the overly restrictive policy, it is considered that the proposed plan will have a detrimental impact upon rural economies whilst protecting antiquated employment strategies. It is therefore considered that the GNLP is not compliant with national policies and the aspiration to support and facilitate rural economies and therefore is considered in conflict with paragraph 35 of the NPPF.

### Change suggested by respondent:

It is considered necessary that a more flexible approach to this policy with regard to facilitating employment generating development in more rural locations be adopted. Furthermore, it is also considered prudent that further assessment of need and trends in relation to employment and business practices is carried out. The policy should also cater to the rise in need of small business and office spaces as well as the need for more sites in better locations where amenities such as public open space is available for employees, mirroring the current trend and protecting and enhancing employee welfare.

If this route is not pursued, an alternative could be to allocate small sites in rural locations. For example, looking at Little Plumstead, we can see that there are local facilities, and sustainable transport options available to local people. As such, it is considered that an allocation for a small extension to the existing Octagon business park would cater to the needs of local residents within close proximity and future employers. Allocation GNLP2107 is considered to be an ideal village allocation which would accord with paragraph 83 and would supplement the sustainable growth and expansion of Little Plumstead whilst providing a localised benefits.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

Attachments: None



24439

Support

**Utilities, 0360/3053/R10 Policy****Respondent:** Firstplan (Mr Ian Keith, Assistant Planner) [19609]**Summary:**

We are instructed jointly by our clients, National Grid (NG) and RWE Generation UK plc (RWE), to make the following representations to the Greater Norwich Local Plan (GNLP) Regulation 19 Publication Draft. NG and RWE are the landowners and joint promoters of the Utilities Site at Cremorne Lane, Norwich. These representations continue our clients' ongoing positive engagement with the Greater Norwich Projects Team throughout the local plan process and confirm the ongoing support for the site's allocation in the GNLP as the examination of the plan draws closer. National Grid and RWE are pleased that the Utilities Site has been carried forward and continues to form a part of the East Norwich Strategic Regeneration Area (Policy GNLP0360/3053/R10) also incorporating:

- Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk;
- Land at Carrow Works, Norwich;
- Land in front of ATB Lawrence Scott.

As highlighted in the publication draft, the principle of development on the site has already been accepted and it is expected that development will take place 'within the time-period of this Local Plan'. As set out in our previous representations and most recently in the Statement of Common Ground, the site has been cleared and as such remains available, suitable and deliverable for development within years 0-5 of the plan. This is of course subject to ensuring that a suitable access arrangement can be funded and viably implemented. Discussions with Homes England and the East Norwich Partnership are ongoing with a view to agreeing a programme of funding. We therefore trust that once the access arrangements are confirmed, the Council will be receptive to a planning application coming forward for development within years 0-5.

In terms of density, whilst there is no specific number identified for the Utilities Site we wish to reiterate that the site will be capable of making a significant contribution towards the overall target of 4,000 new homes within the East Norwich Strategic Regeneration Area. The landowners will be seeking to maximise density on site, as encouraged by the GNLP Team, which will in turn assist with ensuring that a viable, deliverable scheme can be achieved within years 0-5 of the plan period.

As the next stage is the examination, we wish to express our interest in attending the relevant hearings, and participating in any discussions relating specifically to the Utilities Site, in order to continue positive engagement with the Council and the Inspector.

I trust that the above provides clarity on the landowner's continuing support for the site allocation, without reiterating the content of previous representations. However, if any further information or clarification is required, please contact me. Otherwise, we look forward to discussing in more detail when the time comes

I trust that the above provides clarity on the landowner's continuing support for the site allocation, without reiterating the content of previous representations. However, if any further information or clarification is required, please contact me. Otherwise, we look forward to discussing in more detail when the time comes.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23357

Object

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**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Mr Robert Kelly [19835]**Summary:**

The plan will create excessive traffic in and around Aylsham

**Change suggested by respondent:**

The plan should be in a less congested area with less traffic.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23334

Object

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**Policy 0596R, 0596R Policy****Respondent:** Mr Robert Kelly [19835]**Summary:**

This housing development does not take into consideration the already very busy Norwich Road into Aylsham between Tesco's and the town centre. The traffic has increased immensely over the last 5 years and the additional housing plan will create an unjustified and dangerous amount of local traffic in Aylsham.

**Change suggested by respondent:**

The plan shouldn't be scrapped all together or moved to another area.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

24448

Object

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**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** C Kemp [20075]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

Policy 7.4 is unjustified, ineffective, not positively prepared, and not consistent with national policy. Policy 7.4 states that new sites in village clusters will be allocated through a South Norfolk Village Clusters Housing Allocations Local Plan. It is considered that the subdivision of an integral element of the GNLP is not proactive or justified when considering the cumulative growth over the three districts for the next 18 years. The policy states that 1200 homes will be allocated within South Norfolk, however it does not specify where development will be located or whether the strategy will propose equal disbursement of new dwellings across the district or concentrate development within a few key areas. This lack of clarity is in conflict with paragraph 16 of the NPPF which states that policy should be clearly written and unambiguous, resulting in the policy currently being inconsistent with national policy.

Irrespective of how development is proposed across South Norfolk, it is viewed that the second element of the policy, which relates to additional sites, is too restrictive to facilitate growth and ensure vitality of rural communities in accordance with paragraph 78 of the NPPF. Although it is understood why the GNLP proposes only in full development is acceptable, such a policy undermines and destroys the quintessential essence of the character and appearance of rural villages. Simply put, infill development encourages the subdivision of plots and the creation of highly dense development which is incongruous with the historic evolution of most traditional villages. Such a policy will see the densification as well as the upward extension of the more rural localities to the detriment of the character and appearance of the area which is not considered to be a justified approach.

Overall, it is considered that policy 7.4 is inappropriate in its current form as insufficient information has been provided as to how the village cluster allocations will ultimately look and function. There are a number of uncertainties at present regarding where development will be located which undermines any potential assessment of the policy. It is considered the best approach would be an even spread of development across the district, however even with this proposed it is viewed that the overly restrictive idea of infill development only will ultimately, in the long term, undermine the viability of most rural economies.

As such the lack of clarity regarding the proposed wording of the policy and lack of information about where development will be located is in inconsistent with paragraph 16 of the NPPF. Furthermore, the overly restrictive infill only policy is in conflict with paragraph 78 of the NPPF. As such the failure to accord with national policies is considered to render the policy and the GNLP unsound in accordance with paragraph 35 of the NPPF and the proposed overly restrictive strategy is considered to be an unjustified approach.

**Change suggested by respondent:**

In order to make the policy sound it is considered that policy 7.4 should be re consulted on, alongside all other policies that relate to housing when the South Norfolk Village Clusters Housing Allocations Local Plan becomes available. This way a united and informed policy can be carefully considered in light of the wider strategic policies of the GNLP. Irrespective of this however, it is considered that additional development should be supported that relates well to existing settlements and subject to other criteria, such as highway safety, design, and reflection of local densities, for example.

If a more flexible approach regarding the wording of the policy is not adopted, then specific site allocations in rural areas should be considered. For example, looking at Thurston/Ashby St Mary, the site located North of Mill Road, would be an ideal location for residential development. The site relates well to the existing settlement and would be located in a position that allows easy access onto the common. Development here would bolster the local economy whilst also allowing the village to grow in a controlled manner without relying upon significant densification as the current policy proposes, to meet local needs.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23423

Object

**Foulsham and Themelthorpe, 6.37****Respondent:** Mr Simon Kempson [16323]**Summary:**

I object to the Regulation 19 Publication for Foulsham and Themelthorpe on the grounds of very poor access to the proposed housing allocation.

Since the recent Aubrey Rix Close development from Stringers Lane, the junction with Foundry Close has become very busy; and a danger to children and cyclists due to the large increase in the number of vehicles accessing this junction. The proposed additional development will not only increase this safety issue but will also destroy the wildlife corridor backing onto Foundry Close.

**Change suggested by respondent:**

Provide housing in locations that do not significantly increase the danger to children and cyclists accessing the allocation.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23248

Support

**Policy 3003, 3003 Policy****Respondent:** Nigel Key [19391]**Agent:** Mr Magnus Magnusson [14502]**Petition:** 2 petitioners**Summary:**

We support the soundness of the allocation of my clients site reference GNLP 3003 within the GNLP. Please see accompanying Reg. 19 Consultation Statement for further details.

**Change suggested by respondent:**

No modifications proposed at this stage.

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Reg. 19 Consultation Supporting Statement. - <https://oc2connect.gnlp.org.uk/a/43h>

23249

Support

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Nigel Key [19391]**Agent:** Mr Magnus Magnusson [14502]**Petition:** 2 petitioners**Summary:**

We support the soundness of the allocation of my clients site reference GNLP 3003 within the GNLP. Please see accompanying Reg. 19 Consultation Statement for further details.

**Change suggested by respondent:**

No modifications proposed at this stage.

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Reg. 19 Consultation Supporting Statement. - <https://oc2connect.gnlp.org.uk/a/43h>

23691

Object

**Wymondham, 4.62****Respondent:** Mr Martijn Koster [19929]**Summary:**

This paragraph makes no mention of Sutton, which is very much separate from Wymondham, and has its own identity. Proposed site GNLP0320 would obliterate both.

**Change suggested by respondent:**

The plan should explicitly formulate a strategic gap between Wymondham and Sutton, and remove GNLP0320 from consideration permanently.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23692

Object

**Wymondham, 4.56****Respondent:** Mr Martijn Koster [19929]**Summary:**

- I object to the other comment here that GNLP0320 should be considered:
- too remote from Wymondham
  - scale is disproportionate, especially given the adjacent permission
  - final nail in the coffin for Gunville Hall's setting
  - impact on traffic in Sutton lane, which is already struggling
  - flood risk for Sutton Lane, as evidenced by multiple flooding incidents in recent years, even before building on site.
  - secondary school capacity constraint in Wymondham does apply
  - adjacent permission not fully delivered

**Change suggested by respondent:**

I refer to my comment below. The plan should stipulate a strategic gap between Wymondham and Sutton

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23592

Object

**Housing, 53****Respondent:** Mrs Eleanor Laming [19916]**Summary:**

Paragraph 35 of the NPPF says that a plan must be based on proportionate evidence, and be consistent with national policy. The GNLP should comply with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 which says that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' There is insufficient detail in the GNLP to explain how this will be done. 22% more homes are proposed in addition to the level needed. Regulation 19, paragraph 53 in the GNLP says that only a 5% buffer is required by the NPPF. A new road, the Norwich Western Link Road is included in the GNLP. This is incompatible with the climate change statement and its inclusion is therefore unsound. Environmental legislation is likely to change and become more stringent in the coming years as climate change becomes an increasing concern, particularly after COP26 and the effects of climate change become clearer. The GNLP needs to take this into account for it to be sound.

**Change suggested by respondent:**

National GHG's should reach net zero by 2050. This needs to be considered at all levels of the planning policy including: Detailed transport plans for each development. If public transport is non-existent, infrequent or cannot be provided to a good level, the sites should not be developed. Developments should not be based on a need for private car use and delivery van use. Environmental policy. If the location of developments means that houses are at risk of flooding in the future, the site should not be developed. Sustainable suburban brownfield sites should be used rather than greenfield. If GHG emissions related to the development will take the levels high enough to contribute to climate change (they are not net zero) the development should not be built. Carbon emissions related to the development should be calculated and any carbon offsetting measures clearly outlined. The delivery of 49,492 new houses by 2038 is large and it is hard to see how the legally binding target of net zero by 2050 can be achieved with this level of development. The legal minimum number of houses should be the aim, with constant reviews of the situation. There are other councils in the UK who have set better examples of local plans. The GNLP should be a leading plan in the field with radical suggestions to plan for the future safety and provision of the people living in the area, not second best.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24309

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Land Allocation Ltd [20067]

**Summary:****Housing Numbers: Policy 1 The Sustainable Growth Strategy**

Policy 1 identifies that to meet the need for around 40,550 new homes, provision is made for a minimum of 49,492 new homes and sets the settlement hierarchy of Norwich urban area (Norwich and Norwich Fringe, Main towns, Key service centres and Village clusters).

It is centrally important to consider the Local Housing Need requirement in order for an appropriate and sustainable level of growth to be identified and provided for across the Great Norwich Area, delivering a sufficient amount of housing over the plan period. It is noted that this consultation includes a housing figure of 1,961 dwellings per annum, however, there is no real certainty within this Local Plan consultation in regards to the suitability of these figures. A key government objective is to 'significantly boost' housing supply, and it is felt a greater emphasis should be placed on the wording of the policy so that it is recognised as the minimum housing requirement.

Paragraph 60 of the NPPF states that:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

It is important to note that Paragraph 60 of the NPPF and the associated guidance within the PPG are clear that the standard method represents the "...minimum number of homes needed..." The plan must respond to the Government's key objective of boosting the supply of housing. It is important that there is flexibility in the number of housing allocations to ensure that a five-year housing land supply can be maintained over the plan period in order to meet the housing requirement. Therefore, the Council should be seeking to over-allocate housing land to ensure flexibility, choice and competition in the housing market reflecting government guidance.

Any Local Plan currently being prepared will also have to consider the effect of the coronavirus pandemic on the housebuilding industry, and subsequently, the deliverability of the Council's current five-year housing land supply. Whilst still relatively unknown, delays in the deliverability of housing are likely, and therefore, a subsequent undersupply may occur.

The Council have calculated the Local Housing Need, based upon the Standard Methodology resulting in 1,961 dwellings a year, but this calculation was carried out in June 2018. Further, the LHN, when calculated using the Standard Methodology, can fluctuate year to year based upon the housing projections, and the Standard Methodology doesn't take account of economic growth. We therefore, recommend a Housing Requirement between the aggregated Local Housing Need for the three authorities calculated by the Standard Methodology and a requirement that takes account of the economic growth that the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land.

Just as the Local Housing Need can fluctuate, so can the buffer that is required in the context of 5-year housing land supply. The District Council may decide to confirm their 5-year housing land supply, in which case a 10% buffer would apply, and the rate of deliverable may also fall over the plan period, in which case a 20% would apply. We consider that a 20% buffer would ensure that the plan is future-proofed and provide flexibility, choice and competition in the housing market, reflecting government guidance.

We consider that the Council should be targeting a higher housing requirement than the Local Housing Need calculated using the Standard Methodology. It is notable that the proposed requirement does not provide an uplift for economic growth, even though the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land. We support the Local Plans ambition with respect to economic growth and believe that a housing requirement uplift is necessary to support this.

In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). The Plan must be aspirational but deliverable to be positively prepared (NPPF, paragraph 16), and the target of new homes per annum is insufficient to realise job-led housing need across the plan area. In order to be found sound, the Local Plan should be targeting higher growth within the Local Plan in accordance with the above explanation.



**Change suggested by respondent:**

**I** -

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Local Plan Reps FV.pdf - <https://oc2connect.gnlp.org.uk/a/4d4>

24310

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Land Allocation Ltd [20067]**Summary:**

Housing Distribution: Policy 7 Strategy for areas of growth

Policies 7.1 to 7.5 provide details on the housing distribution. The Main Towns of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham provide just over 6,806 homes, approximately 14% of the proposed housing growth planned to 2038.

The GNLP identifies that the Main Towns 'play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. As such, they are engines of rural growth and it is important that they are enabled to grow at appropriate scales, having regard to infrastructure and environmental issues, to enable them to thrive.' Diss is identified as having 'the widest range of shops and services of the main towns, as well as a broad range of employment opportunities mainly located to the east of the town centre close to the railway.'

Policy 7.2 distributes the 6,208 new homes between the Main Towns. Given that Diss the Main Town that the GNLP identified as having the widest range of services, then it is counter-intuitive that other Main Towns have higher growth, for example, Aylsham and Harleston are allocated 550 and 555 new homes whereas Diss is allocated 400 new homes. In order for sustainable growth to be delivered across the Area at the level that is required, the local plan strategy should encompass a need for development within rural areas. Whilst a larger proportion of housing and employment growth should be focused on the urban or improved infrastructure areas, growth should also be located within the areas that the GNLP identifies as playing a vital role in the rural economy.

By permitting development in such settlements, it would help to assist in maintaining the vitality of these rural areas. Further a mix of smaller and medium scale sites can be delivered at a faster rate than the larger, allocated sites. Such sites form an important contribution to the Council's five-year housing land supply and should be considered in order to allow the Councils to continuously maintain a healthy and constant supply of deliverable sites.

In combination with the growth dispersed to the larger settlements, development in rural areas would ensure that there was a level of housing growth across the areas where those houses are needed. It would promote housing and would also ensure that rural areas received appropriate growth levels to maintain and enhance economic vitality, and the services and facilities required would be maintained. This approach would take account of paragraph 78 of the Framework sufficiently to promote housing growth in the rural settlements of the District's. In such areas, more housing would assist in maintaining the vitality of rural areas, including the retention of services and facilities that depend on economic growth. Such an approach will promote greater and more sustainable developments.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Local Plan Reps FV.pdf - <https://oc2connect.gnlp.org.uk/a/4d4>

24311

Object

**Policy 0102, 0102 Policy****Respondent:** Land Allocation Ltd [20067]

**Summary:****Part 2: Allocations**

To simply provide for the local housing need figure of 1,961 per year with an over-allocation of 22% would represent both a vulnerable overall strategy and would therefore be expressly contrary to the requirement to significantly boost the supply of housing embedded within the Framework. It would also lead to insufficient flexibility in the number of housing allocations to ensure that a five-year housing land supply can be maintained over the plan period to meet the housing requirement.

It is considered that this approach provides an overly vulnerable strategy, with little margin for error should there be even just a minor change in circumstances. It is therefore essential that the Council over-allocate housing land further to ensure flexibility, choice and competition in the housing market reflecting government guidance.

Policy 7.2 identifies that Diss as a Main Town and the preamble to the policy states that: 'the town has a strong local employment base and supports three main supermarkets, a wide range of local shops and services in the town centre, and a full range of facilities (including secondary school, GPs, leisure centre, library, a variety of sports clubs etc.).'

The GNLP provides for at least 400 new homes for the town of Diss, which consists of the allocation of Frontier Agriculture for 150 homes and the Diss & District Neighbourhood Plan fulfilling the remaining overall housing requirement. There are also three carried forward allocations and commitments this provides for Diss (including part of Roydon) 754 homes between 2018-2038.

Given the status of Diss and the Towns access to services, it is therefore difficult to comprehend the new allocation of only 150 dwellings in the GNLP with the future allocation of 250 dwellings in the Diss and District Area Neighbourhood Plan.

Policy GNLP0102 allocates land at Frontier Agriculture Ltd, Sandy Lane, Diss (3.61 ha) for residential development to accommodate approximately 150 homes. This site is located to the east of the railway, so noise mitigation will be required and is in an area historically characterised by employment premises, and the site is likely to be contaminated also. The preamble to the policy also states that 'the number of homes sought is set at 150 due to the highly sustainable town centre location, but the exact figure will be subject to detailed design and viability considerations.' The site is unlikely to meet the definition of a deliverable site within the Framework.

Its allocation is even more difficult to comprehend when our clients site at land to the North of Walcot Rise, Diss is not constrained by such matters explained above. There is a willing landowner who has entered into a promotion agreement with our client Land Allocation Ltd who has submitted an outline planning application under reference 19/1555.

The Outline Planning Application was accompanied by substantial supporting documents such as Traffic Assessment, Heritage Impact Assessment, Flood Risk Assessment, Phase 1 Contamination Report, Landscape and Visual Impact Assessment and Ecological Surveys. None of which indicate that there are on-site issues that would prevent the sites allocation for residential development.

There are no significant abnormal or major infrastructure requirements. The Full Policy Requirements for Planning Obligations and CIL are expected to be made, as evidenced by the Outline Planning Application. There is no indication of any viability issues here.

The site forms a natural extension of the settlement, and there are no major constraints or viability matters to prejudice the development of the site for housing. There are no legal issues. The landowners are party to a promotion agreement with our client Land Allocation Ltd. Consequently, the site is deliverable, available and developable now.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Local Plan Reps FV.pdf - <https://oc2connect.gnlp.org.uk/a/4d4>

24249

Object

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**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy**

**Respondent:** Landowners Group Ltd [10906]

**Agent:** Barton Willmore (Joshua Mellor, Senior Planner) [16965]

**Summary:**

Representation discusses various issues regarding:

- Sustainability Appraisal
  - Strategy for development
  - Housing requirement
  - The role of Wymondham within the growth strategy and within the context of main towns
  - Windfalls
  - Education provision in Wymondham
  - Affordable housing
  - Sustainability of land at North Eat Wymondham
- (The rep has been recorded under Policy 1, but is also of relevance to other sections of the plan)

See attachment for full representation.

**Change suggested by respondent:**

See attachment for full representation and suggested changes to the plan

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/4c7>

24244

Object

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**Costessey Contingency Site, 0581 2043 Policy**

**Respondent:** Terra Strategic (Jordan Langdon-Bates, Senior Land and Planning Manager) [19992]

**Agent:** Barton Willmore (Charlotte Cook) [19993]

**Petition:** 2 petitioners

**Summary:**

The Site is currently allocated as part of draft Policy GNLP0581/2043 as a contingency site for residential-led development. For the avoidance of doubt, Terra Strategic control the northern section of the allocation, which has the site reference: GNLP0581. This area of land has the ability to deliver approximately 600 dwellings alongside a primary school, sixth form college and local centre. The Site is allocated alongside adjacent site ref: GNLP2043 (North of New Road, east of A47), which will deliver an additional 200 dwellings – approximately 800 dwellings across the draft allocation. Terra Strategic are in discussions with the adjoining landowners with a Masterplan provided at Appendix 1 which details how the two parcels of land could come forward.

As currently drafted, the Site would come forward for development if there were three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites

As will be set out within these representations, this approach is considered to be unsound and should instead be identified as a full allocation within the forthcoming GNLP as an available, suitable and sustainable location to deliver residential-led development.

See attachment for full representation

**Change suggested by respondent:**

As it currently stands, the site will become an allocation if “there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site-specific constraints (for example there are infrastructure or ownership constraints, or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites”.

The policy is unsound in its current form due to the proposed trigger mechanism which would allow the site to come forward. In particular, through Examination of the Local Plan, the Council should have robustly assessed the ‘site specific constraints’ of the alternative commitments and allocations. Indeed, the draft Delivery Statement sets out a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery can be evidenced. As a result, this requirement should be deleted and instead focused on any subsequent shortfall in housing delivery.

The PPG sets out that from the day following publication of the Housing Delivery Test measurement, where delivery of housing has fallen below the housing requirement, certain policies set out in the

NPPF will apply. Depending on the level of delivery, this states that the LPA should publish an action plan if housing delivery falls below 95% (NPPF, para 75).

To ensure consistency with the national policy and guidance, the following policy wording is suggested:

The site will become an allocation if the Council’s Housing Delivery Test trajectory shows that delivery is expected to fall below 95% there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where under-delivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites.

See full detail in attachment

**Legally** Not specified  
**compliant:**  
**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Regulation 19 Publication Greater Norwich Local Plan (Representations- Terra Strategic).pdf - <https://oc2connect.gnlp.org.uk/a/4c4>

24509

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Summary:**

General response to Regulation 19 Plan from Lanpro Services

Lanpro Services wish to reiterate responses made to the Greater Norwich Local Plan Stage C Regulation 18 Consultation in March 2020.

The Stage C Regulation 18 submissions were made via the local plan portal under the following references / ID's:

Agent: Stephen Flynn

Respondent: Lanpro Services

Representation IDs:

21244, 21246, 21253, 21258, 21261, 21263, 21265, 21266, 21267, 21269, 21272, 21277, 21283, 21287, 21288, 21298, 21301, 21304, 21312, 21314, 21318, 21320, 21322, 21325, 21331, 21332, 21333, 21335, 21336, 21339, 21352, 21355, 21358.

We conclude, in line with our previous representations that certain aspects of the plan are unsound.

**Change suggested by respondent:**

General response to Regulation 19 Plan from Lanpro Services

Lanpro Services wish to reiterate responses made to the Greater Norwich Local Plan Stage C Regulation 18 Consultation in March 2020.

The Stage C Regulation 18 submissions were made via the local plan portal under the following references / ID's:

Agent: Stephen Flynn

Respondent: Lanpro Services

Representation IDs:

21244, 21246, 21253, 21258, 21261, 21263, 21265, 21266, 21267, 21269, 21272, 21277, 21283, 21287, 21288, 21298, 21301, 21304, 21312, 21314, 21318, 21320, 21322, 21325, 21331, 21332, 21333, 21335, 21336, 21339, 21352, 21355, 21358.

We conclude, in line with our previous representations that certain aspects of the plan are unsound.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Cover Letter Lanpro General Reps March 2021 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4gb>

23808

Object

**Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets****Respondent:** Lanpro Services Ltd (Ms Hannah Smith) [16907]**Summary:**

GNLP 0480 is being promoted by Glavenhill on behalf of the landowner for much needed SME scale housing and / or residential care accommodation and can, through appropriate landscaping, offer long term protection to the Strategic Gap between Hethersett and Wymondham.

Glavenhill support the Council's conclusion that the site is suitable for residential development but contend that the Council's rationale for not allocating it is unjustified and therefore 'unsound'

**Change suggested by respondent:**

GNLP0480 should be allocated for SME scale housing and / or residential care accommodation.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 representation - Land west of New Road, Hethersett - redacted - <https://oc2connect.gnlp.org.uk/a/498>



23921

Object

**Aylsham, Settlement Map****Respondent:** Mr James Layte [19889]**Petition:** 2 petitioners**Summary:**

We would like to register our objection in the strongest possible terms to the proposed extra development in Aylsham.

We attended the exhibition in Aylsham town hall where the plans for 300 new homes on one single site were on display. Officers were in attendance who were able to answer certain questions about the proposals, but could not say whether there would be a new doctors surgery to cope with perhaps another 1000 patients, nor adequate school provisions. That was already bad enough, but now we are told that a further 550 homes could be built. This was never consulted on, neither with the public nor apparently with the town council. Can this be legal?

Furthermore, the extra houses would place a completely intolerable burden on existing medical and educational facilities. The extra traffic on the already congested and not very safe A140 between Aylsham and Norwich ( there are certainly no jobs available in Aylsham) would have a seriously detrimental affect on our community.

To sum up, the additional housing does not seem to be legally compliant nor sound, and lacks much needed infrastructure for the area.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23580

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Mr Richard Lindley [19471]**Summary:**

The plan for Foulsham has not been refreshed to take into consideration the recent approval of a large brownfield site planning application for 12/15 new build within the village boundry, Blyth's old builders yard, Claypit Road. This in conjunction with the "13 additional dwellings with planning permission on small sites" highlighted in the potential to achieves the 28 households highlighted.

**Change suggested by respondent:**

The plan requires amending to take t into account the proposed development at Blythes Builders Yard and that with the additional small site builds and the allocation of housing in Claypit Road this almost totals the requirement housing wished for in the GNLP for Foulsham. Further development above this the 13 small sites and Blythes Yard site should be considered more carefully than currently presented due to the impact that this will have on the poor village infrastructure.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23581

Object

**Foulsham and Themelthorpe, 6.35****Respondent:** Mr Richard Lindley [19471]**Summary:**

- School is not easily expanded for the reasons highlighted above.
- High street is congested and cramped with cars parked either side of the street. With more houses and greater use of the high street this would present more traffic throughput and greater risks to pedestrians.
- Employment opportunities are limited with the local businesses (pub, shop and other small businesses) limited to family ran enterprises
- Transport connections are poor with the bus service to Norwich available by walking up to the main road via a dangerous unlit 60mph road

**Change suggested by respondent:**

The description regarding the potential for the school to be expanded is misleading and requires amendment. It appears as if this is assumed to be possible as opposed to being confirmed through a formal inspection.

The impact of further congestion on the high street should considered and should be evaluated prior to the proposed development going ahead.

Place the new houses in areas where there are greater Facilities, employment opportunities and better transport links.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23583

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Mr Richard Lindley [19471]**Summary:**

Given the safety concerns the proposed GNLP0605 raises in respect of the poor (lack of the access to the site through a potentially historically significant hedge) and that the housing needs for the village have been met by other sites the GNLP0605 site allocation is therefore no longer required

**Change suggested by respondent:**

Remove site 0605 from the plan of potential sites for Foulsham as other sites have filled the required quota. Over filling above the 28 required homes by 2038 risks over burdening the poor village infrastructure. Allocate the site to a safe location with more amenities such as doctors, larger shop ect and where village residents can use a bus service to get tot he local towns/cities. THIS IS NOT POSSIBLE IN FOULSHAM

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23582

Object

**Foulsham and Themelthorpe, 6.37****Respondent:** Mr Richard Lindley [19471]**Summary:**

- Danger to safety of pedestrian's caused by poor access where the Aubrey Rix Close development from Stringers Lane, meets Foundry Close. Further use will increase this risk on a junction that is already narrow with cars parked either side.
- Construction traffic required to access the site via a poorly designed junction.
- Destruction of the wildlife corridor which has not been considered.
- Potentially historically significant hedgerow that has not been considered in the plan which would required to be removed for access to be gained to the site.
- Call for Sites has false statements and highlights no benefits!

**Change suggested by respondent:**

- Provide housing in locations that do not significantly increase the danger to children and cyclists accessing the allocation or where remediation works to enhance the safety in respect of the the access to the site are possible.
- GNLP0605 fail to take into account that hedgerow would be required to be removed as the only access to this allocated land is via Aubrey Rix Close. Undertake full due diligence to consider whether the removal of the hedge is permitted.
- Accurately present the call for sites and take consideration of the village border, conservation area and wildlife present.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23586

Object

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**Policy 0605, 6.38****Respondent:** Mr Richard Lindley [19471]**Summary:**

The plan poses a safety risk to children and other pedestrians who will be using the route.

**Change suggested by respondent:**

I do not agree that the proposed access to this site is suitable and, for this reason, the site is not suitable for the proposed development. There are more suitable site exists within the village for a similar size of development.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23587

Object

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**Policy 0605, 0605 Policy****Respondent:** Mr Richard Lindley [19471]**Summary:**

The access to the proposed GNLP0605 development is dependant on gaining access through Aubrey Rix Close, currently there is no access, a fence and a potential historic hedgerow runs right across the necessary access and the current owner of GNLP0605 does not own this access. Assuming access was available the site still would not be suitable and highways need to survey and the current infrastructure to include the high street and the junction connecting the proposed development access with Foundry Close

**Change suggested by respondent:**

Confirmation of the status of the hedgerow needs to be confirmed possible. The highways need to surveyed to contemplate the current traffic issues/concerns

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23588

Object

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**Policy 0605, 0605 Map****Respondent:** Mr Richard Lindley [19471]**Summary:**

The current proposed planning site suitability is flawed as there is no access with out the removal of the hedgerow, no safe pedestrian route to school, and the site has been used in the past for arable use which was not mention in the initial call for sites proposal. In addition there is no mention of the conservation area which the site will back onto and any mitigation works in connection with this conservation area and or the wildlife. The plans are flawed.

**Change suggested by respondent:**

The proposal should be scrapped, other brownfield sites in the village have recently been passed which has resulted in the quota for the village been met.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23639

Object

**Lingwood, 6.77**

**Respondent:** Lingwood and Burlingham Parish Council (Mrs Sonya Dickinson, Clerk) [12965]

**Summary:**

The GNLP Lingwood and Burlingham Cluster Assessment Booklet states, "The current capacity at Lingwood Primary School is circa 74% and rated as red. The spare capacity will be taken up in a few years. Consequently, the scale of housing allocations will be limited to 12-20 dwellings within the cluster."

However, the GNLP Reg 19 publication now states, "Norfolk County Council (as education authority) would accept development in the order of 50- 60 new homes". (Village Clusters, Lingwood 6.77)

February 2021, the school advised the PC that the current capacity is now @89%. (Pupils currently attending 243. Free spaces is 30).

**Change suggested by respondent:**

Consequently, the scale of housing allocations will be limited to 12-20 dwellings within the cluster."

Improved Roads into the Parishes.

A need for a GPs' surgery, before the villages are developed further.

The School is nearly at full capacity 89%

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** GNLP Reg 19 response 18th March 2021.docx - <https://oc2connect.gnlp.org.uk/a/45g>

23640

Object

**Lingwood, 6.78****Respondent:** Lingwood and Burlingham Parish Council (Mrs Sonya Dickinson, Clerk) [12965]**Summary:**

GNLP4016 - We believe inclusion of this site may be unlawful since it appears to contravene Reg 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Duty to Consult), and the National Planning Policy Framework (paragraph 16 (c)), and the Government's Guidance on Plan Making 2020, inasmuch as the local community was never notified of its inclusion. The site was never presented for consultation at Reg 18 stage of the GNLP's site allocations, and the Parish Council has never been given the opportunity to consult with the wider community or comment upon its inclusion.

**Change suggested by respondent:**

We request the site GNLP4016 be removed from the GNDP.

Site of old school in Chapel Road, Lingwood - 20+ properties should be counted as part of our allocation and not classed as 'windfall'.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** GNLP Reg 19 response 18th March 2021.docx - <https://oc2connect.gnlp.org.uk/a/45h>

23685

Object

**Aylsham, Settlement Map****Respondent:** Lindsay Little [19931]**Summary:**

I write to object to these Regulations which were agreed without the opportunity of Aylsham residents being consulted as is, I understand, the normal legal requirement.

The plan for up to 500 new homes in this small market town is ridiculous.

There has been no information about the impact it will have on the community such as the existing schools, doctor surgeries and infrastructure.

There are many narrow roads in the town that cannot be widened due to the existence of houses abutting them so any increase in traffic, due to the increased housing, will make life for existing locals miserable to say the least if not dangerous.

I cannot see why it is regarded as acceptable to put forward two housing developments at once rather than one only and see how that impacts the town before then agreeing to a second-if need be.

Think of the impact your decision will have on existing residents rather than just regarding it as a desk exercise for profit.

I would urge you to reconsider the serious mistake that is being made by allowing these 2 developments to proceed without the opportunity for residents to be consulted properly and legally.

By permitting these developments to proceed in this way you are ignoring the interests of this community.

Please reconsider

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23658

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners



**Summary:**

Policy 1 – The Sustainable Growth Strategy.

5.1 Part 1 of The Strategy, and specifically Policy 1 – The Sustainable Growth Strategy, identifies that the deliverable commitment includes an uplift on the existing allocation of homes delivered since the start of the plan period in April 2018. It is also noted that this provides 74% of the total housing growth identified in this Plan to 2038.

5.2 Table 6 in Policy 1 refers to establishing the Plan’s total housing potential figure. It is observed that in section E New Allocations, there are 10,704 homes to be built within the plan period.

5.3 There is significant concern over the provisional allowance for windfall development as described in Policy 1, paragraph 184. The over reliance the GNLP places on development from windfall sites is questionable. This is especially the case, when the supporting text refers to windfall either as “instead of” or “in addition to allocated growth”.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document - section 5, including comments on the Growth Strategy, settlement hierarchy and the strategic growth areas.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally No  
compliant:**

**Sound: No**

**Comply with Not specified  
duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

## 23659

## Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters**

**Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]

**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]

**Petition:** 2 petitioners

**Summary:**

Policy 7.4 Village Clusters (para. 380-388)

5.61 The GNLP Reg 19 document is proposing that Village Clusters will provide 4,220 homes through existing commitments and further allocations. This is around 9% of the total for the plan period

to 2038.

5.62 It is noted in para.382 that a separate South Norfolk Village Clusters Housing Site Allocations Local Plan is being produced, for a minimum of 1,200 homes in addition to the 1,392 already committed in the Village Clusters.

5.63 In the absence of this document, and its associated evidence base, the quantum of growth being proposed cannot be relied upon.

5.64 It is this approach to the Village Clusters, and specifically the South Norfolk Village Clusters, that Welbeck Land is strongly opposed to.

5.65 The minimum 1,200 new homes in the South Norfolk Village Clusters therefore represents almost a 50% increase on the committed development.

5.66 This would appear at odds with the approach taken by the GNLP towards the larger more sustainable settlements, notably the Main Towns or Key Service Centres.

5.67 This radically different approach towards guiding future development needs to be fully and properly understood, as it would appear a significant departure from the previous approach being advocated in the Reg 18(c) of the GNLP, and also contrary to what is considered to be good and sound sustainable planning.

5.68 Para. 381 suggests providing this level of growth in Village Clusters will promote social sustainability and will help support rural life and services. The GNLP Reg 19 document also suggests that this approach will also benefit small-scale builders and will provide choice to the market in helping to ensure the delivery of housing in popular village locations.

5.69 However, it is suggested that the approach outlined in para. 381 can also be met by the promotion of 'windfall sites' which allows for "very small developments limited to 3 to 5 homes, adjacent to settlement boundaries" (para.379 for Key Service Centres).

5.70 Para. 387 states that "policies 1 and 7.4 also support windfall development for affordable housing in the village clusters in both Broadland and South Norfolk, with some market housing permitted where it supports viability, including self/custom-build. The policies allow for infill and small extensions in those parts of village clusters which have a settlement boundary."

5.71 It is therefore questioned whether the approach being taken with the Village Clusters is actually needed, or indeed is needed to the level of housing growth being proposed, when the approach to 'windfall sites' is being actively promoted through the GNLP as well.

5.72 The wording of Policy 7.4 refers to supporting a range of sites within Village Clusters. The policy goes on to say this can be achieved by providing new sites, along with infill development in settlement boundaries, with additional sites being provided by affordable / market housing schemes.

5.73 This is in addition to the potential for 'windfall sites.'

5.74 As a result, although this approach may appear commendable, it must be noted that this could also be unregulated. Unlike the Urban Area; Main Towns; or Key Service Centres, there are no specific allocations identified for some of the Village Clusters. Instead, there is a large pot of housing growth that still needs to be found. How can this be regulated, or equally proportioned to make sure it meets the aim of supporting a mix of housing sizes and types across the Village Clusters? Is this not the purpose of the 'windfall sites' approach, which would be better suited to this purpose?

5.75 'If' it is believed that the wording in the policy stating: "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" is sufficient to control unregulated growth, then surely this wording and the approach to 'windfall sites' is sufficient in its own right, and there is no need to identify such large numbers to Village Clusters in the first instance.

5.76 There remain grave concerns at the new approach the GNLP is now advocating within the Regulation 19 document, which has not previously been proposed.

5.77 It is therefore questioned how this approach has been reached, and on what basis it is considered to be the best approach to the distribution of housing growth as the spatial strategy for such a vast and widely differing area.

5.78 Welbeck Land therefore does not agree with the approach being taken towards Village Clusters, and it is suggested in the absence a proper and evidenced approach, then this strategy is totally unjustified and unsound.

5.79 The 'Housing Comparison Table' set out below, compares the housing identified between the various Reg 18 and Reg 19 documents (see attached representation).

5.80 It has considered the difference in existing sites and proposed allocations, and comments on the different approaches taken by the GNLP.

5.81 It should be noted that only the Broadland Village Clusters have been added and analysed as part of the 'Housing Comparison Table'.

5.82 The South Norfolk Village Clusters are being calculated in their own separate document, that forms part of the total 9% from Policy 7.

5.83 At the time of writing, the South Norfolk Village Clusters Housing Allocations Plan was looking to identify 1,200 new homes across South Norfolk. Further consultation on the document is anticipated later in 2021.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document - section 7.4 village clusters.

**Change suggested by respondent:**

Welbeck land strongly disagrees with the spatial growth strategy that is being proposed by the GNLP in the Reg 19 document.

The new approach being taken towards the Village Clusters is not supported and is considered to be both unsound and unjustified.

The identification of Village Clusters based on primary school catchment areas is also questioned as a suitable or sustainable approach to future planning growth.

At the same time, there is also a continued reliance on allocating undelivered, or stalled sites, which is also considered to be unjustified and unsound.

Overall, there appears to be no justifiable reason or rationale for the change from the approaches between the Reg 18(c) and the Reg 19 GNLP documents.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally No**

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

## 23660

## Object

### Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres

**Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]

**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]

**Petition:** 2 petitioners

#### Summary:

Policy 7.3 – The Key Service Centres (para. 371-379)

5.56 The GNL Reg 19 documents is proposing that the 9x identified Key Service Centres of: Acle; Blofield; Brundall; Hethersett; Hingham; Loddon / Chedgrave; Poringland / Framingham Earl; Reephham; and Wroxham, will provide 3,679 homes, which is around 7% of the proposed housing growth over the plan period.

5.57 Given existing commitments, the focus of additional housing growth is being directed towards the 4x Key Service Centres of: Acle; Hethersett; Hingham; and Loddon / Chedgrave.

5.58 It is noted that the sustainability of Hethersett is identified in para. 372. This includes close proximity to Norwich and the Cambridge-Norwich Tech Corridor; its good range of services; and good links to Wymondham. Development in Hethersett is being directed towards the north and west of the village, with a strategic gap being identified between Wymondham and Hethersett, focussed on Kett's Oak.

5.59 The aspiration for a strategic gap between the settlements of Wymondham and Hethersett is noted. Although not part of the area identified in the GNL's "Green Infrastructure Map" for Wymondham, the land north of Tuttle Lane East could help to deliver an enforceable boundary to this northern part of the town.

5.60 Policy 7.3 identifies a total of 3,679 new houses to be delivered by the Key Service Centres during the plan period (2018-38). There are 2,984 existing commitments and 695 new allocations. On this basis, 18.9% are new housing allocations

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document - section 7.3 The Key Service Centres.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23661

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns**

**Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]

**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]

**Petition:** 2 petitioners

**Summary:**

Policy 7.2 The Main Towns (para. 345-370)

5.37 Wymondham is identified in the GNLP as a 'Main Town', (para. 345).

5.38 The vital role that towns play in the rural economy, is acknowledged, and supported. Indeed, Welbeck Land welcome the acknowledgement in the GNLP that "they are engines of rural growth and it is important that they are enabled to grow at appropriate scales, having regard to infrastructure and environmental issues, to enable them to thrive."

5.39 Wymondham has a population of approximately 14,500 people and is one of the County's larger market towns. It is the largest settlement in South Norfolk District. Wymondham is situated nine miles from Norwich and is well-connected to local road and rail networks.

5.40 Wymondham as a town is located to the south-west of Norwich. It is close to the A11 and is served by 2x separate junctions, with the B1172 dissecting the centre of the town.

5.41 Wymondham also benefits from having its own train station. It also has a series of education and health care facilities, and it also has a wide variety of shops, facilities, and other amenities. These are well documented in the adopted WAAP.

5.42 It can therefore be seen and agreed that Wymondham is a highly sustainable location. As such, Welbeck Land are therefore happy to agree and support that Wymondham is identified as a 'Main Town' in Policy 7.2,

and as per the settlement hierarchy.

5.43 It is interesting to note that the GNLP have identified 550 additional homes “to support the continued vitality of Aylsham and to locate an appropriate amount of growth in this main town” (para. 352)

5.44 Para. 358 raises concern with Diss as a location for growth: “While delivery of housing has been good in recent years, associated environmental constraints place limits on the potential for housing expansion. Local evidence<sup>111</sup> shows that traffic constraints, particularly on Victoria Road, also reduce the potential for significant additional expansion.”

5.45 Therefore, despite having identified reservations about the ability of the town to delivery housing growth, the GNLP still sees fit to allocate 400 new houses to Diss.

5.46 Harleston is identified as having good transport links, and therefore has further allocations of 555 new dwellings across two sites.

5.47 It is notable that the GNLP has chosen not to make any allocations at Long Stratton at the Reg 19 stage, and instead are relying on the existing allocations through the Long Stratton Area Action Plan.

5.48 Para. 367 notes that a total of 150 new houses have been identified for Wymondham across the two sites in GNLP Reg 19 document. Further growth is reliant on the delivery of the sites within the Wymondham Area Action Plan.

5.49 The supporting text refers to several significant infrastructure benefits for the town of Wymondham. This includes the access to the ‘Cambridge-Norwich Tech Corridor’; the improvements to water capacity being proposed by Anglia Water; and the improved access to the railway station.

5.50 As a consequence, it should therefore reasonably follow that with the suitability and sustainability of Wymondham, reinforced by the infrastructure referred to in the supporting text, Wymondham should accommodate a proportionally significant amount of the future growth for the ‘Main Towns’ as part of the GNLP.

5.51 Policy 7.2 identifies a total of 6,806 new houses towards the Main Towns, which is 14% of the growth during the plan period. This is made up of 5,151 of existing commitments and 1,655 new allocations. On this basis, 24.3% are new housing allocations.

5.52 The simple calculations above clearly demonstrate that there is a reliance on the existing commitments at both Long Stratton and Wymondham, both of which have Area Action Plans in place. In reality, many of the sites in these Area Action Plans have already failed to meet their expected delivery timeframes, a fact that should surely bring into question the confidence in these sites.

5.53 It is therefore considered that there is a fundamental flaw in the continued reliance of the delivery of existing sites in these Area Action Plans, at the expense of properly considered growth across all of the Main Towns.

5.54 Aylsham, Diss and Harleston account for almost 91% of the new allocations in the emerging GNLP, whilst Wymondham and Long Stratton account for less than 10%.

5.55 Welbeck Land therefore strongly disagrees with the approach being taken towards the spatial distribution of strategic growth, especially across the Main Towns.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document - Section regarding Policy 7.2.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNL P would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNL P's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23662

Object

**Delivery, Delivery Statement****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:**

Welbeck Land agrees within the GNLP in promoting a pro-active approach to delivery of housing, by only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be clearly evidenced. However, Welbeck Land does not support the disproportionate allocation approach that is being taken by the GNLP between the different levels of the settlement hierarchy.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document - Section 4.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23663

Object

**Population, 40****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners



**Summary:**

Greater Norwich estimated population 2018 to 2038

3.1 Within paragraph 40, it is noted that the standard methodology was originally based on the 2014 growth projections, with the GNLP then deciding to move towards using the 2018 projections for the growth identified within the Plan's housing requirements.

3.2 Although use of more up-to-date figures and projections is supported, Welbeck Land would suggest that the 2018 figures do not actually go far enough. For example, they do not allow for the impact of Covid-19, nor the influx of additional housing demand that will be placed on an area, which in turn will increase economic activity and impact on the infrastructure requirements to be provided within the Plan. It is admitted that this is impossible to plan or legislate for, but it does indicate that no 'slack' for unexpected growth has been allowed for within the Plan, or in the most sustainable locations.

3.3 Welbeck Land strongly agrees with paragraph 51 which states that the "GNLP needs to plan for additional housing needs above and beyond existing commitments based on evidence."

3.4 It is therefore exceedingly disappointing that this approach has not been carried forward within the rest of the Reg 19 document.

3.5 Paragraph 55 notes the uncertainty surrounding the impact of both Covid-19 and Brexit on the wider economy and the demand for office to residential conversion / windfall sites. However, there is little mention of how this could impact on people's habits and choices in terms of where they live.

3.6 The GNLP is unsure whether the rate of supply will increase or decrease over time. The GNLP has stated "given the uncertainty, it is reasonable to assume that supply will continue at the same rate." It is questioned whether this is a sound approach to be taking to strategic growth.

See full representation

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23664

Object

**Housing, 58****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:****Housing**

3.7 Paragraph 58 refers to local evidence and suggests that 28% of housing required from 2015 to 2038 should be affordable housing. However, there is evidence to later suggest that a policy of 40% affordable housing should be applicable outside of the Norwich Fringe Area.

3.8 Welbeck Land support the identification within the Strategic Housing Market Assessments suggesting that around 3,900 additional communal establishment places for over 75s will be required to 2038.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttlés Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttlés Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23665

Object

**The economy, 64****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:**

Economy

3.9 Welbeck Land supports the strategic employment sites and competitive land, and business lets that are identified within the Norwich and Wymondham areas, which support the globally significant growth axis in the Cambridge-Norwich Tech Corridor.

3.10 Welbeck Land also supports the identification of Wymondham and the Hethel Engineering Centre, Browick Exchange, as part of the Cambridge-Norwich Tech Corridor.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttlles Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttlles Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23668

Object

**The Road Network, 77****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:**

3.12 Welbeck Land acknowledge and support the identification of the A11 corridor as a major focus of growth, as is suggested in paragraph 77 of the GNLP Reg 19 document. The CambridgeNorwich Tech Corridor is aiming to take advantage of the boost to economic development and will therefore need to be supported by the appropriate infrastructure being made available.

3.13 It is noted, and supported, that significant grant funding has been secured to improve the cycle network in and around Norwich, as well as investing in other routes between Wymondham, Norwich, and Sprowston.

3.14 The aim of continuing to promote public transport, and transport network growth, around areas such as Wymondham with its train station, is also supported by Welbeck Land..

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttlés Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttlés Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

23669

Object

**Wymondham, Settlement Map****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:**

Welbeck land strongly disagrees with the spatial growth strategy that is being proposed by the GNLP in the Reg 19 document.

The new approach being taken towards the Village Clusters is not supported and is considered to be both unsound and unjustified.

The identification of Village Clusters based on primary school catchment areas is also questioned as a suitable or sustainable approach to future planning growth.

At the same time, there is also a continued reliance on allocating undelivered, or stalled sites, which is also considered to be unjustified and unsound.

Overall, there appears to be no justifiable reason or rationale for the change from the approaches between the Reg 18(c) and the Reg 19 GNLP documents.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

24523

Object

**What is the Local Plan?, 3****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:****GNLP SECTION 1 – INTRODUCTION**

2.1 The plan has a serious responsibility which is to determine the pattern and level of development in the plan area till 2038.

2.2 It is imperative that such a pattern and level of growth is compatible and compliant with the NPPF and therefore the imperative must be on ensuring a sustainable spatial strategy.

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttlés Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttlés Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

24524

Object

**Education and Social Mobility, 75****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners**Summary:**

Education and Social Mobility

3.11 It is noted that the GNLP will need to make provision for additional schools and school places to serve future growth. This approach is supported by Welbeck Land.

Please see full representation attached

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

24525

Object

**Site Assessment Booklets and Studies, Main Towns Assessment Booklets****Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]**Petition:** 2 petitioners

**Summary:**

6.1 The Wymondham Assessment Booklet documents all of the comments collected from the Reg 18(c) public consultation period. To accompany this, there were also detailed site assessments carried out of the 'reasonable alternative' sites for Wymondham.

6.2 Of particular interest to these representations is site GNLP0006 Land to the north of Tuttle Lane east, Wymondham. The site was deemed to be a 'reasonable alternative', despite being found to be both suitable and viable. The site was also described as being within easy access of a range of services, and therefore should be considered sustainable.

6.3 Additionally, sites should be considered highly acceptable if they were part of a comprehensive approach to the development of the area, which then help to deliver strategic infrastructure. As part of the Cambridge-Norwich Tech Corridor and key growth area, it would be rightly assumed that GNLP0006 would be a key site that would sustainably contribute to the expansion and allocated growth for Wymondham.

6.4 It is further noted within the Reg 18(c) Site Assessment Booklet for Wymondham page 35, that there is an identified total deliverable housing commitment for Wymondham of between 2,563 and 3,563 homes between 2018- 2038. These previous figures include for an additional 1,000 homes on GNLP0006, as a reasonable alternative site. A contingency figure of 1,000 units was therefore identified for Wymondham, although no sites were identified.

6.5 The question therefore must be what has changed in Wymondham since the GNLP Reg 18(c) document? Why has the contingency of 1,000 units no longer being included? And what formal planning process was used to support and sustain the decision to dismiss the reasonable alternative sites?

6.6 It will be interesting to understand how these decisions have been reached, when considered against the infrastructure requirements in the key growth areas, that will aid the provision of creating sustainable communities. For example, Norfolk County Council have made it clear that there is considerable pressure at Wymondham for secondary pupil places, which would not be able to cope with further growth without new school provision.

6.7 Welbeck Land have held discussions with Norfolk County Council Education and Wymondham High School. GNLP0006 can successfully provide and implement the relocation and enhancement of the Secondary School and Sixth Form Education Facility. This invaluable infrastructure provision could cater for the required growth within Wymondham, which would aid successful growth within the Key Growth Areas, as identified within Policy 1 of the GNLP.

6.8 It is noted that HELAA allocated site (GNLP3013) sits well within the settlement form. However, it is suggested that the site would start to protrude out into the countryside, if brought forward in isolation as per the current allocation in Reg 19. It would sit far better by being carefully considered and brought forward as part of a wider sustainable expansion for Wymondham.

6.9 Welbeck Land do not agree with the absence of "reasonable alternative sites" for Wymondham, and especially the reluctance of the GNLP to provide reserve sites for further additional growth towards the end of the plan period. Development at Norwich and along the Tech Corridor will create an increasingly strong and economically attractive region, thereby driving the availability of funding as per Policy 1 for new infrastructure that caters for further strategic development.

See attachment for full representation particularly section 6 - Greater Norwich Local Plan Evidence Base



**Change suggested by respondent:**

It is considered that the spatial strategy of the GNL P would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNL P's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

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**24526****Object**

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**Site Assessment Booklets and Studies, Strategic Flood Risk Assessment (SFRA) Level 2**

**Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]

**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]

**Petition:** 2 petitioners

**Summary:****Flooding and Drainage**

6.14 Cannon Consulting Engineers have considered the evidence base provided to support the GNLP Reg 19 document, in relation to the site on land north of Tuttle Lane East, Wymondham. This includes the Strategic Flood Risk Assessment (SFRA) that accompanies the Reg 19 document.

6.15 When discussing the sites at Wymondham, the SFRA refers to identifying areas for flood management measures to help reduce flows into the River Tiffey. Welbeck Land's site on land north of Tuttle Lane East is very well location to help reduce the rate of runoff being discharged into the Tiffey.

6.16 Anglian Water sewer plans and online mapping show that the adopted surface water sewers serving an area to the south of Tuttle Lane discharge to the watercourse which flows (westwards) through the north-east section of the site. Due to this, the site is well placed to provide some attenuation of stormwater flows from part of the urban catchment of Wymondham.

6.17 The inclusion of a flood alleviation basin or basins along the northern bank of the watercourse will make space for water being discharged from Wymondham. Combined with the potential diversion of the watercourse through the area (to create a sinuous channel), the alleviation basin also offers the opportunity to treat the runoff from Wymondham as well as ecological benefits associated within the channel and its banks.

6.18 Providing such attenuation accords with the suggestion in section 6.3.1.2 of the Greater Norwich Level 2 Strategic Flood Risk Assessment (SFRA) that development sites should include additional water, and that Local Planning Authority (LPA), Environment Agency (EA), and Lead Local Flood Authority (LLFA) should work together to identify areas for providing flood alleviation features.

6.19 It is noted that the sub-heading of section 6.3.1.2 is "Tiffey Upstream of Wymondham" whereas the land north of Tuttle Lane East, lies downstream of Wymondham. However, as the SFRA discusses the aspiration for flood alleviation measures is in the context of the wider Tiffey catchment, (which is upstream of Norwich).

6.20 As the proposed (developer funded) flood alleviation feature will help attenuate runoff generated from Wymondham before it reaches the River Tiffey, developing land north of Tuttle Lane East will therefore provide off-site benefits in line within the GNLP evidence base.

See attachment for full representation, particularly section 6 - Greater Norwich Local Plan Evidence Base

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally No  
compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

24527

Object

## Site Assessment Booklets and Studies, Viability Study

**Respondent:** Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]

**Agent:** James Bailey Planning Limited (Mr James Bailey, Director) [19927]

**Petition:** 2 petitioners

### Summary:

#### Viability Appraisal

6.21 It is noted that further viability work has been undertaken as part of the evidence base to support the GNLP Reg 19 document.

6.22 Turner Morum LLP previously provided Welbeck Land with an assessment of the "Interim Viability Study" prepared by NPS group (November 2019) as part of the evidence base to support the Reg 18(c) GNLP document. It is noted that a further "Viability Appraisal" was carried out by NPS group (December 2020) to support the Reg 19 GNLP document.

6.23 However, there appears to have been limited changes made between the Interim Viability Study (Nov 19) and the Viability Study (Dec 20), so on this basis the majority of the points previously raised by Turner Morum LLP still remain relevant, and unaddressed.

6.24 Whilst there is general support for the approach being adopted, there remains concerns regarding the assumptions being made within the Viability Appraisal. It is still suggested that the sales values; build costs; and benchmark land values, are too generic and not backed up by comparable evidence.

6.25 It remains the view that larger sites being identified in the GNLP 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.

6.26 Consideration should also be given to whether it remains viable for some of the larger identified strategic sites, to pay both the Community Infrastructure Levy in addition to the policy requirements of the Local Plan. The use of Section 106 planning obligations to secure infrastructure costs should be properly explored by the GNLP. This approach continues to work well in other parts of East Anglia, with such an approach being successfully adopted and implemented by Mid Suffolk District Council, which is entirely consistent with the Community Infrastructure Regulations (2019).

6.27 It remains unclear if the general comments previously raised by Turner Morum LLP with the Interim Viability Study (Nov 19) have been adequately addressed, so they are reiterated below:

- The document has adopted average market revenues of £279 per ft<sup>2</sup> for Wymondham, which is considered too high.
- Based on market evidence the figure should be £250 per ft<sup>2</sup>. The affordable rent values are included at 60% of Open Market Values (OMV) averaging £168 per ft<sup>2</sup>, which is believed to be too high. Based on recent evidence it is suggested that this figure should be between 45%/50% of open market value.
- The intermediate units (Affordable Homes Ownership) are included at 75% of OMV averaging £212 per ft<sup>2</sup>, which is

believed to be too high. Based on recent evidence it is suggest that assuming a shared ownership model, the figure should be between 65% of open market value.

- The Interim Viability Study document is vague about what the Affordable Housing units are intended to be. However, the GNLP Viability Assessment Paper (2018) is clear that standard intermediate housing are the intended units.
- A figure of only £193,000 per net acre for strategic infrastructure is included whereas, based on experience of similar viability assessments, this should be approximately double. The approach is to include 20% on-top of BCIS for all external and strategic infrastructure costs, although 10% (as a minimum) would be required for plot externals costs – which leaves the remaining 10% for strategic infrastructure costs.
- The GNLP analysis does not apply contingency or professional fees to the externals works of strategic infrastructure costs – which is a significant figure that would be further increased if strategic infrastructure cost were included
- The allowance for finance costs, which are equivalent to juts 1.0% of GDV/ 1.3% of scheme costs, is very low. Based on comparable viability assessments, these costs should be double.

6.28 The identification of Wymondham as a Main Town within the settlement hierarchy is supported.

6.29 In the interests of ensuring that the Local Plan targets are met in relation to housing growth, and to avoid any ambiguity with the policies of the Greater Norwich Local Plan in terms of forecast growth and how it will be met, it is recommended that Land at Tuttlles Lane East, Wymondham (GNLP00006) should be allocated for housing development.

6.30 Allocating site GNLP00006 will provide certainty for a range of stakeholders, not least the local education facilities at Wymondham, and ensure that development and infrastructure can be delivered in a planned and coordinated manner.

6.31 It is at this point it is important to reiterate the matters previously made in the representations that were submitted to the Reg 18 (c) document by Bidwells on behalf of Welbeck Land. In particular, these relates to the "Assessment of Deliverability" section, pages 16-22 of those previously submitted representations, which relate to the site's "suitability"; "availability"; and "viability". (These are detailed in the previous submissions).

6.32 It is recommended that the contingency numbers previously identified within the Reg 18 stage be reinstated and allocated appropriately, in order to prevent ambiguity in where development may or may not be located. By continuing to retain a contingency site at Costessey, it is clear that the GNLP acknowledge they are placing an overreliance on their allocated sites coming forward and being delivered in a timely fashion. Therefore, should one or more sites fail to deliver in the manner or timeframes expected, then the ability to deliver the plan in a coordinated and sustainable manner is undermined.

6.33 The allocation of strategic and contingency sites would help to provide certainty for the likes of Norfolk County Council Education, to identify a clear strategy in relation to future infrastructure provision.

6.34 The quantum of growth directed towards both the Norwich Urban Area and the Village Clusters in South Norfolk cannot be relied upon without the provision of clear evidence.

6.35 The reliance on existing strategic site allocations to deliver is also questionable. For example, the major site at North Rackheath has been allocated since 2010 and earmarked in the AMR (2010-11), for delivery in 2013-14. Since the Reg 18 stage, yet more growth has been forecast for North Rackheath. However, development of the initial allocation is yet to start. It is acknowledged that "commencement is now behind the milestone" and is expected to start delivering houses from 2024, (Joint Core Strategy for Broadland, Norwich and South Norfolk, AMR 2018-19, Appendices and Statements, 5th February 2020, p.187).

6.36 This clearly reiterates the importance of providing contingency sites in alternative suitable locations, such as Land at Tuttlles Lane East, Wymondham (GNLP00006), which is genuinely deliverable within 4 years of the adoption of the Greater

Norwich Local Plan.

See attachment for full representation, particularly section 6 - Greater Norwich Local Plan Evidence Base

**Change suggested by respondent:**

It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy.

In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site.

The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.

Please see the full representations made by James Bailey Planning Ltd. on behalf of Welbeck Land in the accompanying document.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/45k>

## 24189

## Support

### Policy 0253, 0253 Policy

**Respondent:** Mr Feng Li [13566]

**Summary:**

We would wish to participate in the hearing session to support the site and help answer to any potential objections.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

## 23254

## Object

### Policy 0312, 0312 Policy

**Respondent:** Loddon Parish Council (Ms Emily Curtis, Town Clerk) [13830]

**Summary:**

Please see the accompanying representation.

It is considered that the proposed amendments would result in Policy GNLP0312 reflecting the needs of Loddon and its community positively. Furthermore, it would ensure that the policy is effective.

**Change suggested by respondent:**

Loddon Parish Council Representation to the Greater Norwich Local Plan - Regulation 19 Pre-Submission Draft Local Plan Part 2 The Sites

Loddon Parish Council would like to make the following representations to draft Policy GNLP0312: Land East of Beccles Road.

Loddon Parish recognise and welcome the early engagement undertaken by Hopkins Homes. It is requested that this engagement continues in a proactive and meaningful manner with Loddon Parish Council and the community at key stages of the sites' promotion, pre-application scheme development, proposed application scheme and during the consideration of any associated planning application.

**Current Wording:**

POLICY GNLP0312 Land to the east of Beccles Road, Loddon (approx. 7.70 ha) is allocated for residential development. This site is likely to accommodate at least 180 homes.

More homes may be accommodated, subject to an acceptable design and layout being achieved and any infrastructure issues addressed.

The development will be expected to address the following specific matters:

1. Two points of vehicular access to be provided into the site.
2. Areas of surface water flooding on the Beccles Road boundary or elsewhere in the site to be addressed
3. Any development must conserve and enhance the significance of listed buildings within the Loddon and Chedgrave Conservation Area to the north-west of the site, including any contribution made to that significance by setting
4. Design and layout must address the topography of the site and potential impact on views, particularly to and from the Broads.
5. The trees/hedgerows surrounding the site will be protected, enhanced and incorporated into the scheme.
6. An ecological assessment must be carried out, and any identified impacts on nearby sites mitigated
7. The design and layout of the scheme must consider amenity impacts relating to the nearby business area.

Proposed Amendments (see attachment for clearer version of suggested wording)

POLICY GNLP0312 Land to the east of Beccles Road, Loddon (approx. 7.70 ha) is allocated for residential development. This site is likely to accommodate at least 180 homes.

More homes may be accommodated, subject to an acceptable density, design, layout and onsite open space and soft landscaping being achieved and any onsite and offsite infrastructure issues addressed.

The development will be expected to address the following specific matters:

- New homes to be of mixed size and type and to include affordable housing.
- Two points of vehicular access to be provided into the site.
- Areas of surface water flooding on the Beccles Road boundary or elsewhere in the site to be addressed
- Any development must conserve and enhance the significance of listed buildings within the Loddon and Chedgrave Conservation Area to the north-west of the site, including any contribution made to that significance by setting
- Design and layout must address the topography of the site and potential impact on views, particularly to and from the Broads.
- The trees/hedgerows surrounding the site will be protected, enhanced and incorporated into the scheme.
- An ecological assessment must be carried out, and any identified impacts on nearby sites mitigated
- The design and layout of the scheme must consider amenity impacts relating to the nearby business area.
- Provision of appropriate pedestrian crossing point(s) on Beccles Road as required by the Local Highway Authority.
- Highway capacity and safety improvement(s) to the A146/ Beccles Road junction as required by the Local Highway Authority.
- Off-site financial contribution(s), secured by Section 106 Agreement, towards new or improving existing community facilities within Loddon. Such facilities to be identified through discussions and agreement with Loddon Parish Council.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Full representation, showing amendments in red - <https://oc2connect.gnlp.org.uk/a/43j>

24174

Object

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### Policy REP1, REP1 Policy

**Respondent:** Lovell Partnerships Ltd [11385]

**Agent:** Bidwells (Mrs Sarah Hornbrook, Associate) [14444]

#### Summary:

Reepham is a sustainable location for growth, benefitting from existing facilities, such as a primary and high school, doctor's surgery, dentist, SPAR, alongside a range of shops, places to eat and drink, employment opportunities, and public transport provision.

As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. As previously recognised, there are no constraints which would affect the suitability of the site for the proposed development of at least 140 dwellings, cemetery extension and sports hall, as further demonstrated in the live planning applications.

Minor alterations to the scope of the allocation and the policy wording are required to ensure its soundness.

See Attachment.

#### Change suggested by respondent:

Minor alterations to the scope of the allocation and the policy wording are required to ensure its soundness.

See Attachment for details including revised policy wording.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Rep - <https://oc2connect.gnlp.org.uk/a/4vn>

24346

Object

**Policy 0378R/2139R, 0378R/2139R Policy****Respondent:** Lovell (Mr Will Wright, Land & Partnership Manager) [17174]**Petition:** 2 petitioners**Summary:**

The two landowners, together with their representatives, strongly support this allocation, and are proposing to bring this forward for development immediately. We anticipate that following receipt of planning consent, construction will commence in 2024 with a construction period of 7 years, completing in 2031.

The landowners' development partner, Lovell Partnerships, has considered the site's constraints within its masterplan and assessment of viability. The scheme is entirely deliverable, having regard to the shared infrastructure in a phased manner.

See attached document for full representation.

**Change suggested by respondent:**

Having regard to the delivery of the shared infrastructure we consider it appropriate to amend the wording of the policy slightly, to ensure that the scheme is phased to ensure the link road is delivered by the development. The phased delivery of the link road will mean that the upfront costs are managed to ensure the scheme remains viable.

As such we recommend that point 4 should be amended to 'Provision of a link road, in accordance with an agreed phasing plan, between Norwich Road and South Walsham Road of a sufficient standard to accommodate HGV and agricultural traffic' The amendment will ensure that the policy is justified and, therefore, sound.

See attached document for full representation including suggested wording change to the policy.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 164-20-0200\_P5-Masterplan - Draft-compressed.pdf - <https://oc2connect.gnlp.org.uk/a/4dh>  
Acle Regulation 19 Site Representations 21.03.2021.pdf - <https://oc2connect.gnlp.org.uk/a/4dx>



23752

Object

**Aylsham, 4.3****Respondent:** Mrs Sue Lovett [19813]**Summary:**

There has been no consultation with Aylsham Town Council or residents on the addition of 250 houses to the 300 in Regulation 18. The amount of new housing estates that will greet the visitor on entering Aylsham from the west, south and east is a detriment to the historic town itself. No account has been taken of road layouts, parking, infrastructure such as schools, medical practices, water and sewage systems and increase in carbon footprint.

**Change suggested by respondent:**

This plan needs to be abandoned.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23797

Object

**Policy 0506, 2.73****Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]**Summary:**

Please refer to representation submitted in respect of Policy GNLP0506 paragraph 2.72

**Change suggested by respondent:**

Please refer to representation submitted in respect of Policy GNLP0506 paragraph 2.72

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

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**23800****Object**

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**Policy 0506, 2.74**

**Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]

**Summary:**

Please refer to representation submitted in respect of Policy GNLP0506 paragraph 2.72

**Change suggested by respondent:**

Please refer to representation submitted in respect of Policy GNLP0506 paragraph 2.72

**Legally** Yes

**compliant:**

**Sound:** Yes

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

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**23813****Object**

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**Policy 0506, 0506 Map**

**Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]

**Summary:**

Please refer to representation submitted in respect of Settlement Map Policy GNLP0506.

**Change suggested by respondent:**

Include land 'under the flyover' on Magdalen Street within Policy GNLP0506 Land at and adjoining Anglia Square.

**Legally** Yes

**compliant:**

**Sound:** Yes

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23792

Object

**Norwich, Settlement Map Centre****Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]**Summary:**

Policy GNLP0506 -Land at and adjoining Anglia Square should also include the land 'under the flyover' on Magdalen Street; whilst this land is in part owned by Norwich City Council, its regeneration should be linked to that of the Anglia Square area which it adjoins.

**Change suggested by respondent:**

Amend the text in Policy GNLP0506, and the Settlement Map to include the land 'under the flyover' , and amend the site area for the policy in the text accordingly.

**Legally** Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23793

Object

**Policy 0506, 2.72****Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]**Summary:**

The detailed background and description of Anglia Square, along with the strategic objectives for its regeneration would benefit from clarification, updating and greater comprehensiveness. The full text for the preamble to Policy GNLP0506 - Land at an adjoining Anglia Square - is set out below. This covers all the paragraphs in the preamble, not just the first. Accordingly, representations are not made on the preamble paragraphs that follow the first. Separate representations are made in respect of the actual text proposed for Policy GNLP0506.

**Change suggested by respondent:**

The full text of the preamble to Policy GNL0506 should be amended to read as follows:

**POLICY GNL0506: Land at and adjoining Anglia Square**

Anglia Square is a 1960s neighbourhood shopping precinct, forming the main part of the large district centre in the north of the city centre. It comprises shop units around a public square which provide a popular convenience retail offer, above which a series of buildings in poor condition, built as public parking, leisure venues and offices, are now all vacant other than some meanwhile uses. It adjoins further open sites which were cleared and never redeveloped, together with a group of buildings at the Pitt Street and St Crispin's Road junction, and an area under the flyover fronting Magdalen Street which is little used and of poor appearance. This entire wider site is a major regeneration priority. The capacity of Anglia Square to deliver a significant element of the plan's housing need on a highly accessible brownfield site means that it has strategic significance for Greater Norwich. The Employment, Town Centre and Retail Study (GVA, 2017) acknowledges the considerable potential of Anglia Square to accommodate a much-enhanced facility, with a retail and leisure offer and including extensive public realm improvements. Whilst the retail and leisure markets have continued to evolve since 2017, the aim here is for redevelopment proposals to provide a sufficient quantum of replacement floorspace to retain the site's position as part of a defined large district centre, complementing the city centre retail offering, whilst avoiding over-provision.

This floorspace should be available for a range of Class E and other main town centre uses, suited to the location and residential upper floors, to be distributed along the Magdalen Street frontage and the principal route from Magdalen Street to St Augustine's Street. This accommodation should aim to offer the necessary flexibility of uses and unit sizes so as to provide resilience to future market changes.

Development of the site must address a number of constraints including its location within the City Centre Conservation Area, the Area of Main Archaeological Interest, and the critical drainage catchment area; its relationship with neighbouring statutory and locally listed buildings; the site ground conditions; its prominent location at gateways to the city, the need for removal of the derelict and long-term vacant buildings from the site, for increased greenery, and for enhanced transport infrastructure in the vicinity and pedestrian and cycling permeability through the site, linking to the surrounding area. A noise impact assessment and air quality assessment will be required, and the development must be designed to mitigate the impact of noise from the surrounding main roads within the dwellings in any scheme.

There is an expectation that the site should be able to accommodate in the region of 800 homes, although a higher number would be acceptable if a scheme demonstrates that the site constraints can be successfully addressed. The City Centre affordable housing requirement should apply unless demonstrated to be unviable. Even in such circumstances, a meaningful proportion of the dwellings must be affordable, although the precise level will need to be the subject of detailed viability assessment. All redevelopment proposals will also provide a mix of affordable tenures consistent with identified needs at the time of submission of a planning application.

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

## 23812

## Object

**Policy 0506, 0506 Policy**

**Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]

**Summary:**

Policy GNL0506 needs to be amended in line with the suggested revised preamble set out in the representations for paragraph 2.72, and for clarity and conciseness.

**Change suggested by respondent:**

Policy GNLP0506 text should be amended as follows:

**POLICY GNLP0506**

Land at and adjoining Anglia Square, Norwich (approx. 4.79 hectares) [NOTE: TO BE INCREASED TO INCLUDE LAND UNDER THE FLYOVER] is allocated for residential-led, mixed-use redevelopment as the focus for an enhanced and improved large district centre and to act as a catalyst for wider investment and redevelopment within the Northern City Centre strategic regeneration area as defined in policy 7.1 of this plan.

The site will deliver in the region of 800 homes, with a higher figure acceptable subject to demonstration that the site constraints are successfully addressed.

The redevelopment will be expected to achieve, subject to investigation and justification of viability implications, the following site-specific requirements:

1. A comprehensive, mixed use regeneration scheme which can include residential development, student accommodation, retail units contributing to the Magdalen Street/Anglia Square/St Augustine's Street large district centre, suitable main town centre uses, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities as part of a balanced mix;
2. A sufficient retail and leisure offer to support the local community and the large district centre;
3. Removal of the derelict and long-term vacant buildings from the site, including Sovereign House and the existing multi-storey car park;
4. Provision of levels of replacement high quality car parking that are the minimum necessary to serve the requirements of the future residents and the large district centre;
5. Achievement of high quality, locally distinctive and energy efficient design with scope for:
  - a) a landmark building or buildings providing a new gateway or focal point for the Northern City Centre and
  - b) a mobility hub featuring shared transport services (buses, car club and bike share) centred on Magdalen Street in the vicinity of the flyover to promote use of sustainable transport modes by residents, visitors and other users;
  - c) public realm improvements incorporating an attractive and vibrant link between Magdalen Street and St Augustine's Street, as part of legible and user-friendly streets and public spaces throughout the site and on its Magdalen Street frontage, (including land under the flyover), thereby providing significant improvements in pedestrian and cycle connectivity and permeability across the site north-south and east-west, with improved integration to the surrounding network.
6. All buildings sited and scaled to conserve and enhance the significance of heritage assets and their settings, including the City Centre Conservation Area and nearby listed buildings at Magdalen Street, Doughty's Hospital, Doughty's Cottages, St Augustine's Street (including grade I listed Church of St Augustine), and Gildencroft,;
7. High quality landscaping, planting and biodiversity enhancements;
8. A satisfactory residential internal noise environment within the scheme via necessary mitigation of noise from the surrounding main roads and the proposed mix of uses, as demonstrated via a noise impact assessment;
9. Satisfactory air quality within the development for all sensitive receptors and also in terms of the scheme's impact on surrounding sensitive receptors as demonstrated by an air quality assessment
10. Heritage interpretation measures to be incorporated in accordance with Policy 3 of this plan.

A continuing retail offer within Anglia Square is sought throughout the redevelopment process, which must be demonstrated as part of details of the phasing of the works to be agreed with the Ipa.

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23817

Object

**Housing, 58****Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]**Summary:**

Section 2 paragraph 58 needs to indicate whether "the highest requirement for general market housing is for 3 bed homes" is universally applicable across the GNLP area, or, whether it does not apply in Norwich City Centre, where demand for smaller units may be likely to be the largest group, as per Section 3 paragraph 135, which distinguishes Norwich City Centre.

**Change suggested by respondent:**

Section 2 paragraph 58 should be amended if it is the case that within Norwich City Centre, the highest requirement for general market housing is not 3 bed homes, but, (if the case), smaller homes.

**Legally** Yes**compliant:****Sound:** Yes**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23827

Object

**The Northern City Centre, 316****Respondent:** pal-planning ltd (Mr Peter Luder, Director) [19950]**Summary:**

Policy 7.1 The Northern City Centre: the text would benefit from a number of amendments / corrections / additions to better set its context and the regeneration objectives, to align with Policy GNLP0506, as proposed via the representations submitted on behalf of Weston Homes. Clarification is also needed that the objective to preserve office accommodation within the city centre, potentially via an Article 4 Direction in respect of permitted development changes of use to residential, would not apply to the Policy GNLP0506 Land at and adjoining Anglia Square site, where redevelopment of redundant office buildings for residential use is welcomed.

**Change suggested by respondent:**

Policy 7.1 - The Northern City Centre: - paragraphs 316 - 324 should be amended as follows: (intervening paragraphs with no change are indicated as such, but included in order to assist comprehension of the suggested wording):

NOTE: In view of this comprehensive representation on Policy 7.1, no further representations are lodged in respect of each of the paragraphs noted here for amendment.

316

Anglia Square, is a 1960s neighbourhood shopping precinct, forming the main part of the large district centre in the north of the city centre. It adjoins further open sites which were cleared and never redeveloped, together with a group of buildings at the Pitt Street and St Crispin's Road junction, and an area under the flyover fronting Magdalen Street which is little used and of poor appearance. This entire wider site is also a major regeneration priority. The capacity of this wider site focussed on Anglia Square to deliver a significant element of the plan's housing need on a highly accessible brownfield site means that it has strategic significance for Greater Norwich. The Employment, Town Centre and Retail Study (GVA, 2017) acknowledges the considerable potential of Anglia Square to accommodate a much-enhanced retail and leisure facility, including extensive public realm improvements. However, the needs of the retail and leisure markets have already since evolved, and are likely to continue to change. Accordingly the appropriate quantum and range of uses of replacement floorspace cannot be accurately identified at this time, although both must be sufficient to retain the site's position as part of a defined large district centre, complementing the city centre retail offering.

317

The policy therefore promotes high density, housing-led mixed-use redevelopment of Anglia Square and surrounding vacant land. Redevelopment proposals should also include retailing, employment, community and leisure facilities as identified to meet emerging market needs.

318 (no change)

Regeneration of Anglia Square is also intended to be the catalyst for substantial investment in, and further regeneration of, the wider northern city centre. As a result, the whole of the northern city centre area as defined in map 9 is identified on the Key Diagram as a Strategic regeneration area.

319 (no change)

The northern city centre has been declared a neighbourhood area for planning purposes. This policy provides the strategic context for any more detailed plans for the area.

320

Anglia Square has been subject to several comprehensive mixed-use regeneration proposals over many years, the most recent of which Norwich City Council resolved to approve in December 2018. The Secretary of State "called-in" the application for determination and refused it notwithstanding a recommendation to approve it. The decision gives considerable comfort that medium to high density residential led mixed-use development in this location is appropriate and should be part of this plan. The previous scheme required support to be viable for delivery. It is likely that any future scheme will also require public support to ensure implementation.

321 (no change)

To provide strategy on the wide range of planning issues affecting the city centre, the remainder of the city centre element of the policy is divided into six sections on: the economy; retail and main town centre uses; leisure, culture, entertainment and the visitor economy; housing; the natural and built environment and access and transportation.

322

The policy seeks to attract and retain employment in the city centre by boosting employment sectors identified by evidence in the GVA study as having most growth potential, in particular knowledge based and digital creative industries, providing for a suitable range and choice of employment premises particularly in locations which are well related to transport hubs, offer good linkages with existing and expanding business networks and provide high value employment opportunities as part of the regeneration of key sites and areas. A key part of retaining employment in the city centre will be to reverse the significant loss of office employment, although this aim does not apply to the Northern City Centre Anglia Square site (Policy GNLP0506, where redundant office buildings are to be replaced by residential-led regeneration). To this end the city centre policy provides the basis for the subsequent introduction of an Article 4 direction or directions to manage the loss of office floorspace in relevant locations, and ensure a supply of suitable sites and premises for the key city centre employment growth sectors, most particularly digital and creative industries.

323 (no change)

Retail and other main town centre uses policy set out in policy 7.1 provides flexibility and recognises the trend for changing uses and functions in city centres. The aim is to ensure the centre provides an attractive location in which people can experience a complementary range of different uses, services and activities, including retailing. The Norwich City Centre Retail Strategy prepared by the Norwich Business Improvement District endorses this approach. It

acknowledges that a vibrant, diverse and accessible offer providing a range of different experiences for the visitor, alongside promotion of a strong and distinctive sense of place and identity, will be key to the long-term economic success of Norwich city centre.

324

Policy 6 places the city centre retail area at the top of the retail hierarchy, with the large district centres at Riverside and at Anglia Square, Magdalen Street and St. Augustine's Street providing a complementary role and meeting more day to day needs. The extent of, and more detailed policies for, the city centre retail area, and the primary and secondary retail areas within it, along with the large district centres, are set out in existing development management policies

325 (no change)

The GVA study floorspace calculates that 11,000-15,000 square metres of additional comparison retail floorspace will be required in the Norwich urban area by 2027. However, in the light of potentially rapid further changes in comparison retailing it is premature to allocate any new retail sites. This will be revisited in the review of the plan when the future of retailing becomes clearer. The study forecasts no significant need for additional convenience retail floorspace by 2027.

326 - 332 (no change)

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

## 24084

## Object

### Policy 5 Homes, Policy 5 Homes

**Respondent:** M Scott Properties Ltd [15451]

**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]

**Petition:** 2 petitioners

#### Summary:

The policy's objective of providing a full range of types, tenure and costs of housing to meet varied housing needs is, in principle, supported. In addition, the provision of minimum space standards and requirements for adaptable homes to be provided to improve the quality of life and meet the needs of an aging population is also supported. However, there are a number of elements of the Policy that require alteration to ensure soundness.

#### Affordable Housing

As drafted the policy states that only applications on brownfield sites will be able to challenge affordable housing provision at the application stage. The policy should, in accordance with paragraph 57 of the NPPF recognise that, notwithstanding work to inform a site allocation in the Local Plan, a viability assessment can be submitted at the application stage. The NPPF advises that the weight afforded to the viability assessment at the application stage will be a matter for the decision maker and will have regard to all circumstances in the case, including whether the evidence underpinning the local plan is up to date and whether there has been a change in circumstances since the plan was brought into force.

On this basis, to ensure the policy is justified and consistent with national policy and, therefore, sound, it is recommended



that the wording of the policy is revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

### Space Standards

Whilst the intention to adopt the Government's Nationally Described Space Standard (NDSS) is readily acknowledged, it is essential that the policy explicitly provides the necessary justification, as required by footnote 46 of paragraph 127 NPPF. This clearly states: "Policies may also make use of the nationally described space standard, where the need for internal space standard is justified".

This justification is essential, as strict adherence to space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. For example, in terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow those on lower incomes to afford a property which has their required number of bedrooms. At this stage, notwithstanding the PPG, there would appear to be no robust evidence that would suggest that development below space standards is a particular concern throughout the GNLP area, and that the rigid adherence to NDSS is necessary.

Accordingly, we would suggest that if this element of the policy is to be retained that, as a minimum requirement, the policy should provide some flexibility to recognise need and viability, where necessary.

Whilst the principle of specialist housing is generally supported, clarity is required on what type of specialist housing will be required to provide affordable housing. More specifically, it is not considered that residential and nursing care homes constitute dwellings that generate a requirement for affordable housing provision. In addition, it is considered that the policy should provide a definition as to what is affordable care. Without this information, the policy is not considered to be effective.

### Self & Custom Build

The provision of self and custom build is recognised. However, the threshold that at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots is not considered to be justified.

The threshold would result in the number of self and custom build units provided being substantially in excess of the identified need. As stated at paragraph 282, there are only 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The strategic sites identified on the GNLP i.e. those over 1,000 units, would on their own, deliver substantially more than the identified need.

Whilst it is recognised (and welcomed) that the policy includes wording that provision is not required if there is no need, it is suggested that the threshold is reduced to a level which better reflects need.

In addition, to provide clarity the policy, or supporting text, should provide further evidence on what is classified as a self / custom build unit. For example, if a developer provides a potential purchaser with a degree of choice in relation to the layout and design of their unit, such as the reconfiguration of layouts to suit individual requirements, or the provision of foundations, pipework to facilitate an extension at a later date, does this constitute a Custom Build unit for the purposes of the policy?

On this basis, the policy is neither considered to be justified or effective and, therefore, is not sound.

**Change suggested by respondent:****Affordable Housing**

The policy should be revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.

**Space Standards**

In the apparent absence of the necessary robust evidence to justify it, the policy should, if this element is to be retained, provide some flexibility to recognise need and viability, where necessary.

The policy should clarify the type of specialist housing that will be required to provide affordable housing, as well as a definition of what is affordable care.

**Self and Custom Build**

The threshold should be increased, to better reflect the likely need. Clarity on the definition of self/custom build should be provided in the policy or supporting text.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24080

Object

**Policy 0337R, 0337R Policy****Respondent:** M Scott Properties Ltd [15451]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

On behalf of M Scott Properties Ltd (Scott Properties) we strongly support the allocation of GNLP0337R, Land between Fir Covert Road & Reepham Road, Taverham.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, the detailed wording is not sound, as elements are neither effective or justified. Minor alterations are therefore sought to ensure its soundness.

See attached document for full representation.

**Change suggested by respondent:**

See attached document for full representation and suggested amendments to the wording of the policy.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/49t>

24081

Support

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** M Scott Properties Ltd [15451]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

The GNLP's approach to providing choice and flexibility in terms of housing growth by accommodating 22% more homes than are needed+ is supported.

The 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.

The proposed Settlement Hierarchy is fully supported. Norwich and the Urban 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 66% of the housing growth during the period to 2038.

On this basis, the proposed the Policy is considered to be sound.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24082

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** M Scott Properties Ltd [15451]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners

**Summary:**

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, and, where applicable, the provision of Delivery Statements.

However, whilst principle of the policy is considered sound, amendments are required to the detailed wording of the policy to ensure that, in accordance with the tests set out in paragraph 35 of the NPPF, it is sound. Therefore, minor alterations to Policy GNLP0132 are therefore sought, to ensure its soundness.

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, however, the policy 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.

On this basis, it is considered that, as drafted, the policy is neither positively prepared or justified given that it fails to provide flexibility to enable the policy to respond to changing circumstances and meet identified need.

**Change suggested by respondent:**

To make the Local Plan sound, criterion 4 of Policy 2 - Sustainable Communities should be revised as follows:

Make efficient use of land with densities dependent on site characteristics and scheme specific considerations, with higher densities and car free housing in the most sustainably accessible locations in Norwich. Indicative minimum net densities are 25 dwellings per hectare across the plan area and 40 in Norwich.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

## 24083

## Object

### Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure

**Respondent:** M Scott Properties Ltd [15451]

**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]

**Petition:** 2 petitioners

**Summary:**

The strategic objectives in relation to transport, education, energy, water and health infrastructure are generally supported.

In particular, the flexibility the policy provides for the provision of new schools to take account of changing circumstances and allow for the timely delivery of schools when and where they are required, is supported.

Notwithstanding the foregoing, when considering infrastructure provision, consideration should be given to the implications for development viability on 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 and which is required to facilitate growth in the wider area, not just to meet demand generated by the site itself.

The implications for viability on the larger strategic sites should be considered through site specific Viability Appraisals as suggested by paragraph 57 of the Viability Assessment (December 2020).

**Change suggested by respondent:**

To ensure that strategic infrastructure can be provided through the development of the strategic sites identified in the Local Plan, and that specific sites do not bear a disproportionate burden of infrastructure provision, the policy should be amended to make provision for a reduction in other policy requirements, such as affordable housing, where appropriate and demonstrated to be justified, in order to ensure that developments required to delivery strategic infrastructure are viable.

To ensure that strategic infrastructure, such as primary schools, can be provided through the development of the strategic sites identified in the Local Plan, we consider that site specific viability appraisals should be undertaken to ensure that, notwithstanding the identified infrastructure requirements, the developments are viable. This would ensure a consistent approach with paragraph 57 of the Viability Assessment (December 2020)

The proposed amendment will ensure that the local plan is deliverable over the plan period and, therefore, sound.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

**24085**

**Support**

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes**

**Respondent:** M Scott Properties Ltd [15451]

**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]

**Petition:** 2 petitioners

**Summary:**

The proposed Settlement Hierarchy and the identification of Norwich and the Urban Fringe as the location to accommodate 66% of the housing growth during the period to 2038 is strongly supported.

Norwich and the Urban Fringe is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing.

The Urban Fringe will play a significant role in providing sustainable growth, given their proximity to employment opportunities, services and strategic infrastructure, such as Broadland Northway. In addition, by virtue of its location, the fringe parishes are in close proximity of the countryside providing ease of access to the leisure and recreation opportunities it provides.

The fringe parishes provide opportunities for strategic growth i.e. over 1,000 units. Developments of this scale are capable of providing a wide range of infrastructure improvements, such as schools, employment, health centres and green infrastructure, which will provide benefits to both existing and future residents.

This approach is entirely consistent with paragraph 72 of the NPPF, which advises that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities."

The identification of Taverham as a location to accommodate approximately 1,400 dwellings by way of a strategic urban extension is fully supported.

Taverham provides a highly sustainable location to provide a strategic urban extension of a minimum of 1,400 units. It represents an excellent location with good access to Norwich, that has been significantly enhanced by the recent delivery of the Broadland Northway. The buffer created by the Broadland Northway presents an opportunity for a logical strategic urban extension to the settlement of Taverham at a size and scale that can, whilst being proportionate to the scale of the settlement, accommodate a significant quantum of the infrastructure and housing required in the Greater Norwich Area over the next two decades.

Taverham already benefits from a variety of amenities including a public house, a supermarket, takeaways, petrol filling station and a garden centre. In addition, the area is within close proximity of the amenities provided within Thorpe Marriott and Drayton. Nightingale and Ghost Hill Infant schools are located in close proximity of the site, as are Taverham Junior and High Schools. A private school (Langley Preparatory School at Taverham Hall) is located nearby. These will be sustained and enhanced by the increased population proposed.

**Change suggested by respondent:**

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**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24312

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** M Scott Properties Ltd [15451]**Agent:** Strutt & Parker (Adam Davies, Associate Director) [17169]**Summary:**

Please see accompanying statement and supporting information regarding site GNLP0341 in Diss and its suggested allocation for older peoples housing.

**Change suggested by respondent:**

Please see accompanying statement and supporting information. Site GNLP0341 in Diss should be allocated for older peoples housing

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Site Location Plan (GNLP0341).pdf - <https://oc2connect.gnlp.org.uk/a/4d5>  
 Sketch Masterplan (GNLP0341).pdf - <https://oc2connect.gnlp.org.uk/a/4d6>  
 GNLP0341 Reg 19 Repls.pdf - <https://oc2connect.gnlp.org.uk/a/4d7>  
 Pre-application Document.pdf - <https://oc2connect.gnlp.org.uk/a/4wz>

24313

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** M Scott Properties Ltd [15451]**Agent:** Strutt & Parker (Adam Davies, Associate Director) [17169]**Summary:**

Please see accompanying statement and supporting information regarding site GNLP0341 in Diss and the request that it should be allocated for older peoples housing in the plan.

**Change suggested by respondent:**

Please see accompanying statement and supporting information. Site GNLP0341 in Diss should be allocated for older peoples housing in the plan

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Site Location Plan (GNLP0341).pdf - <https://oc2connect.gnlp.org.uk/a/4d5>  
 Sketch Masterplan (GNLP0341).pdf - <https://oc2connect.gnlp.org.uk/a/4d6>  
 GNLP0341 Reg 19 Repls.pdf - <https://oc2connect.gnlp.org.uk/a/4d7>  
 Pre-application Document.pdf - <https://oc2connect.gnlp.org.uk/a/4wz>



24314

Object

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**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** M Scott Properties Ltd [15451]**Agent:** Strutt & Parker (Adam Davies, Associate Director) [17169]**Summary:**

Please see accompanying statement and supporting information regarding site GNLP0341 in Diss and the request for it to be allocated for older peoples housing in the plan.

**Change suggested by respondent:**

Please see accompanying statement and supporting information for site GNLP0341 in Diss and the request for it to be allocated for older peoples housing in the plan.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Site Location Plan (GNLP0341).pdf - <https://oc2connect.gnlp.org.uk/a/4d5>  
Sketch Masterplan (GNLP0341).pdf - <https://oc2connect.gnlp.org.uk/a/4d6>  
GNLP0341 Reg 19 Reprs.pdf - <https://oc2connect.gnlp.org.uk/a/4d7>  
Pre-application Document.pdf - <https://oc2connect.gnlp.org.uk/a/4wz>

**Policy 2136, 2136 Policy**

**Respondent:** M Scott Properties Ltd [15451]

**Agent:** Strutt & Parker (Adam Davies, Associate Director) [17169]

**Summary:**

Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government's objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed. Paragraph 72 of the NPPF indicates that the supply of a large number of new homes can often be best achieved through planning for large scale development such as extensions to existing towns. The allocation of Site GNLP2136 is clearly compatible with these objectives. The Site is deliverable and extensive work has already been undertaken along with community engagement to ensure that it can contribute to the District's housing supply, delivering sustainable development in the early part of the Plan period. Accordingly, Scott Properties strongly supports the inclusion of the Site as an allocation in the Plan.

Please see attached representation and supporting documents for further information.

**Change suggested by respondent:**

Please see accompanying statement.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Sketch Accommodation Plan Drawing No. 154-20-0301 Revision P8.pdf - <https://oc2connect.gnlp.org.uk/a/4d8>  
Site Location Plan - Land at Briar Farm Harleston (GNLP2136).pdf - <https://oc2connect.gnlp.org.uk/a/4d9>  
Representation.pdf - <https://oc2connect.gnlp.org.uk/a/4dv>  
Pre application response.pdf - <https://oc2connect.gnlp.org.uk/a/4db>

24316

Object

**Diss, Settlement Map****Respondent:** M Scott Properties Ltd [15451]**Agent:** Strutt & Parker (Adam Davies, Associate Director) [17169]**Summary:**

We consider that the land East of Shelfanger Road and West of Heywood Road, Diss (GNLP0250/0342/0291) should be reinstated as an allocation within the Plan, given it was a previously preferred allocation that there is no sound reason or evidence to justify its exclusion from the Plan at this stage. The Site is deliverable, suitable, and achievable and will deliver much needed new housing in a sustainable location in Diss, along with other associated community benefits including a new link road to address current traffic problems and land for the expansion of Diss Cemetery.

It is considered that the failure of the Plan to allocate sites in Diss, and the decision to follow an amended strategy to devolve new allocations to meet the majority of the strategic new housing requirement to the Neighbourhood Plan, cannot be considered sound. This strategy is not consistent with Policy 1, Policy 7 or Policy 7.2 of the Plan which do not make any reference to such an approach, nor do they make any contingency in the event that such deferred allocations are not forthcoming. This is not an approach being followed for other Designated Neighbourhood Plan Areas and there is no justification for the decision for site GNLP0102 to remain as an allocation within the Plan, to the exclusion of GNLP0250/0342/0291. This is particularly given site GNLP0102 has not been demonstrated to be deliverable, is not supported at the local level and could come forward irrespective of a receiving an allocation with the Plan, or Neighbourhood Plan. We therefore consider the Pre-Submission Draft Plan to be unsound in respect of the lack of new allocations in Diss, and as such, it cannot be considered positively prepared, justified, effective or consistent with national policy.

Please see accompanying Report and supporting information.

**Change suggested by respondent:**

Please see accompanying Report and supporting information.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Site Location Plan - GNLP0291 & GNLP0342.pdf - <https://oc2connect.gnlp.org.uk/a/4dc>  
Representation.pdf - <https://oc2connect.gnlp.org.uk/a/4dd>

23955

Object

**The GNLP and other local plan documents, 24**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

You will be aware that we have raised some concerns regarding the fact that you are not proposing to update the Development Management policies at this stage during the Reg 18 consultation and in subsequent meetings.

Whilst paragraph 20 of the Reg 18 Plan left open the possibility for some limited amendment to such policies, and we had also previously been told at Reg 18 that the DM policies would be reviewed in advance of the Reg 19 Plan, this now no longer seems to be the case.

Indeed the new text in paragraph 24 makes it clear that the GNLP will be used in conjunction with the existing adopted Development Management Policies.

Whilst we accept that this is a perfectly acceptable approach to Plan review, and indeed many of the policies set out in the existing adopted Development Management Plans and the City Centre Conservation Area Appraisal are good and valuable, Historic England continues to have concerns that this still leaves some policy areas lacking.

In particular we are concerned that there is a lack of strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.

Please review these policy areas and ensure the Plan provides sufficient

**Change suggested by respondent:**

Ensure taller buildings and heritage at risk as well as designated and non-designated heritage assets are appropriately covered in the GNLP.

See comments in relation to taller buildings and policy 3.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23956

Object

## The Built and Historic Environment, Table 3 - Numbers of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

### Summary:

Paras 104-107 and Table 3

We welcome the changes made in these paragraphs to better reflect NPPF terminology (scheduled monuments, heritage assets and Registered Parks and Gardens) as well as the additional sentence referencing the city centre's current street pattern reflecting historic influences.

We continue to suggest reference to what heritage is at risk and historic landscape characterisation.

### Change suggested by respondent:

Please add a sentence in relation to heritage at risk and also historic landscape characterisation.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23957

Object

## The Vision for Greater Norwich in 2038, 125

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

### Summary:

We continue to suggest that you change historic assets to historic environment. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.

### Change suggested by respondent:

Change historic assets to historic environment. Alternatively you could use the term heritage assets in line with the NPPF.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23958

Object

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**Environment, 147**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the reference to the protection and enhancement of distinctive local characteristics of our city, towns and villages and their separate identities. This is a really important aspect of ensuring a positive strategy for the historic environment in your Plan in line with para 185 of the NPPF. We also welcome the reference to high quality, well designed and beautiful new development picking up on the Building Better Building Beautiful report.

However, this paragraph should also refer to landscape.

**Change suggested by respondent:**

Also refer to distinctive landscapes.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23959

Object

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**Addressing Climate Change, Climate Change Statement**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

There is currently no reference to the question of climate change and the historic environment. It might be appropriate to include some reference to this in this section of the Plan.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> to be helpful in understanding these special considerations.

**Change suggested by respondent:**

Include reference to climate change in historic environment here

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23960

Object

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**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the new reference to the historic environment in Policy 2 and Table 8. These are helpful additions to the policy.

Policy 2 would be further improved with specific reference to conservation area appraisals in criterion 5 to read

...taking account of landscape or historic character assessments including conservation area appraisals, design guides and codes

**Change suggested by respondent:**

Amend criterion 5 of policy 2 to read,

...taking account of landscape or historic character assessments including conservation area appraisals, design guides and codes

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>



23961

Object

**The Built and Historic Environment, 202****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

The NPPF requires Plans to include a positive strategy for the historic environment (para 185). We continue to suggest that you include 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 it is that we need to protect and enhance

**Change suggested by respondent:**

Add more description about what is distinctive/unique etc. about the historic environment of the Norwich and the surrounding area. It is important that the plan is locationally specific and provides more than generic policies and guidance that simply repeat national policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
 Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>  
 Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23962

Object

**The Built and Historic Environment, 203****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

The NPPF requires Plans to include a positive strategy for the historic environment (para 185). We continue to suggest that you include 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 it is that we need to protect and enhance.

**Change suggested by respondent:**

Add more description about what is distinctive/unique etc. about the historic environment of the Norwich and the surrounding area. It is important that the plan is locationally specific and provides more than generic policies and guidance that simply repeat national policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
 Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>  
 Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23963

Object

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**The Built and Historic Environment, 203**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

Replace historic assets with heritage assets in line with the terminology used in the NPPF.

**Change suggested by respondent:**

Replace historic assets with heritage assets

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23964

Object

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**The Built and Historic Environment, 205**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

Replace historic assets with heritage assets in line with the terminology used in the NPPF.

**Change suggested by respondent:**

Replace historic assets with heritage assets

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23965

Object

**The Built and Historic Environment, 208****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Replace historic assets with heritage assets in line with the terminology used in the NPPF.

**Change suggested by respondent:**

Replace historic assets with heritage assets

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23966

Object

**The Built and Historic Environment, 204****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We broadly welcome reference to guidance including landscape character assessments conservation area appraisals, listed building and scheduled monuments information and archaeological records.

We note reference to heritage impact assessments. We would comment that HIA at planning application stage does not negate the need for Heritage impact assessments for inform site allocations. More on this issue in relation to the site allocations section of the Plan (see Appendix B of our response).

Amend scheduled ancient monuments to scheduled monuments, the preferred NPPF term.

**Change suggested by respondent:**

Amend scheduled ancient monuments to scheduled monuments, the preferred NPPF term

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23967

Object

**The Built and Historic Environment, 207****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

At the start of this paragraph, make the point that harm should be avoided in the first instance.

**Change suggested by respondent:**

State that harm should be avoided in the first instance.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23968

Object

**The Built and Historic Environment, 208****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome reference in this paragraph to Heritage at Risk. In this paragraph

Although this paragraph now references Heritage at Risk, there is still no specific mention within the policy. We strongly suggest that Heritage at Risk is specifically mentioned in policy 3.

**Change suggested by respondent:**

Add a sentence on Heritage at Risk to Policy 3.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23969

Object

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**The Natural Environment, 222**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of this paragraph which mentions the relationship between Green Infrastructure and the historic environment.

We suggest replacing Historic Environment assets with heritage assets, the preferred term and in line with the NPPF.

The paragraph could be strengthened by adding the following wording:

Green Infrastructure can have a role 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.

**Change suggested by respondent:**

Replace 'historic environment assets' with 'heritage assets'.

Add text in relation to the role of green infrastructure in relation to the historic environment to read,

'Green Infrastructure can have a role 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.'

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23971

Support

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**The City Centre, 312**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

■ We welcome the reference at bullet point two to conserving and enhancing the historic and natural environment.

**Change suggested by respondent:**

■ -

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23972

Object

**The Northern City Centre, 316****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Historic England recognise that this area contains a number of key brownfield sites and understand the importance of regeneration in the area for the city as a whole.

We note the amendments made to the Anglia Square site allocation policy and also to policy 7.1 to reference some of the key principles for development in this area. However, we continue to have some significant concerns regarding the approach to development at Anglia Square and the lack of HIA evidence to inform the allocation. Further more detailed comments are provided in relation to policy 7.1 and site allocation policy GNLP0506.

However, one of our key concerns in this area relates to Carrow Works (Abbey/Priory). We have set out in more detail our concerns in Appendix B in relation to this site but in summary, we question the capacity of the site and suggest that a more detailed Heritage Impact Assessment be undertaken before the next draft of the Plan to inform the suitability or otherwise of the site, the likely impact of development upon the significance of heritage assets, the extent of the developable area and hence capacity of the site, any necessary mitigation or enhancements that could be made and then any changes required to policy wording.

**Change suggested by respondent:**

Undertake detailed HIA for Anglia Square site.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23970

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

This policy is quite generic and could be a policy for anywhere in the country. We suggest that you make the policy more locally specific in order to make a positive contribution to local character and distinctiveness in the Greater Norwich Area

**Bullet point 1**

Whilst we broadly welcome the requirement for heritage impact assessment to accompany proposals for development, more fundamentally, HIA is also needed to inform the Plan making process, the suitability of the site per se and any particular capacity issues/design criteria that should be included in the Plan. HIA to inform planning application is not a substitute for HIA at plan making stage.

**Bullet point 2**

The second bullet point requires amendment. Harm should be avoided in the first instance. Only where harm cannot be avoided should we move on to consider the tests and weighing exercise as set out in the NPPF.

And the tests are more subtle than is implied here which just talks about outweighing. Of course, we know that:

a) Substantial harm requires substantial public benefits that outweigh the harm

b) Whereas for less than substantial harm, public benefits are weighed against.

c) And for non-designated heritage assets a balanced judgement is required.

You could add the phrase, 'in accordance with the requirements of the NPPF' to help clarify the position.

**Bullet point 3**

Expand this bullet point to make specific reference to the need to address Heritage at Risk.

Include a separate paragraph in the policy after 'importance of the heritage asset.' To read, 'The Councils will maintain and update the Heritage at Risk Register and develop a strategy for addressing Heritage at Risk.'

**Change suggested by respondent:**

Make the policy more locally specific.

Suggest reordering bullet points, 2, 1, 3.

Bullet point 1 We re-iterate our advice that HIAs are required to inform site allocations and as part of the evidence base for the Local Plan. These need to be completed before the EiP.

Amend bullet point 2 to more properly reflect the tests in the NPPF. You could add the phrase, 'in accordance with the requirements of the NPPF'.

Amend bullet point 3 to also specifically refer to heritage at risk.

Include a separate paragraph in the policy after 'importance of the heritage asset.' To read, 'The Councils will maintain and update the Heritage at Risk Register and develop a strategy for addressing Heritage at Risk.'

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>



Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

## 23973

## Object

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

#### Summary:

Historic England raised concerns regarding some of these housing figures at the Regulation 18 consultation. At the time, we specifically requested HIAs for a number of sites to test and inform the capacity of sites in the Local Plan. These HIAs have not been completed, calling into question the accuracy of the capacity of some of these sites.

It would be helpful to know which sites in addition to Anglia Square contribute to the 1558 commitment for the Northern City Centre Area, in order to properly assess whether this is realistic.

We note that the figures for East Norwich have doubled from 2,000 to 4,000 dwellings. In the absence of Heritage Impact Assessment, it is difficult to say whether this uplift in capacity is realistic.

To that end, we find the Plan unsound as it is not justified since it is not based on sufficient evidence in relation to the historic environment.

Whilst we consider that it will be possible to achieve high densities on brown field sites compared with the densities of many parts of the city, it would not be appropriate to seek the densities associated with very tall buildings in metropolitan areas. See separate comment on capacities of sites at Appendix B.

#### Change suggested by respondent:

Prepare HIAs of key sites to inform site capacity and amend figures accordingly if necessary..

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

## 23974

## Object

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:****Title**

We welcome the change to this title to specifically reference the historic environment.

**First sentence**

Again this is very generic – please make this more locationally specific to Norwich

**Bullet point 2**

We welcome the amplification of the second bullet point to include reference to scale mass, height, layout and materials as well as the reference to the character of the Conservation Area and the City Centre Conservation Area Appraisal. We suggest that wording of this criterion is amended and re-ordered to read, New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), Heritage Impact Assessments and the Taller Buildings and the Skyline Study in particular in relation to scale, mass, height, layout and design. New development will be sustainable and, where appropriate, innovative design.

We also welcome the deletion of the bullet point in relation to landmark buildings.

**East Norwich Bullet Point 7:**

We again register our concern regarding the doubling of the housing figure from 2000 – 4000 for this area. We question whether this is realistic, in light of historic environment considerations. Again we suggest an HIA is prepared to more properly inform the capacity of these sites and assess the potential impact on the historic environment.

We welcome 7th bullet point in relation to heritage assets. Whilst it is unfortunate that specific reference to certain key heritage assets has been deleted, we welcome the fact that the policy wording recognises the need to protect not only heritage assets at the sites but also the wider city's heritage assets.

**Elsewhere in the urban Area:**

There is currently no reference to the need to conserve and enhance the historic environment within the list of bullet points for these areas.

Amend the Plan to include a bullet point in relation to the historic environment.

**Change suggested by respondent:**

First sentence – make more locationally specific to Norwich

We suggest that wording of this criterion is amended and re-ordered to read, 'New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), Heritage Impact Assessments and the Taller Buildings and the Skyline Study in particular in relation to scale, mass, height, layout and design. New development will be sustainable and, where appropriate, innovative design.'

East Norwich Bullet point 7: Complete HIA in advance of EiP to inform capacity of area.

Elsewhere in the urban area: Amend the Plan to include a bullet point in relation to the historic environment.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

23976

Object

**Appendices, Appendix 2 Glossary****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We continue to suggest that you add in definitions for Listed Building and Local List and Registered Park and Garden. Change Scheduled Ancient Monument to scheduled monument for the reasons set out above.

**Change suggested by respondent:**

Add in definition for Listed Building and Local List and Registered Park and Garden. Change Scheduled Ancient Monument to scheduled monument

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23975

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

Evidence base for planning for new settlements

We note that the authorities are planning for new settlements in the next Plan cycle. We strongly advise that sufficient evidence in relation to the historic environment is prepared to inform the choice of new settlement.

We would expect a Heritage Impact Assessment to be undertaken for each of the proposed new settlements in order to assist in comparing the different options and selecting a preferred option..

We would then expect more detailed heritage impact assessment of the chosen site to inform the allocation itself e.g. capacity, extent of developable area, areas of open space, landscaping etc. required as heritage mitigation.

We note that reference is made to Garden City Principles in paragraph 398. Whilst Historic England broadly welcomes new settlements, it is important that these are carefully located and planned with respect to all three strands of sustainable development. One of the strands of sustainable development includes the protecting and enhancing the historic environment.

Landscape (including landscape character areas and historic landscape characterisation) and heritage assets should be considered from the outset when determining the location of a new settlement in order to ensure that development can be delivered whilst having regard to the these assets. It is expected that strategic new settlement policies makes reference to the historic environment and the need for its conservation or enhancement.

Many Local Plans state that new settlements should come forward as a new 'Garden Village' based on the Town and Country Planning Association's principles for Garden Cities. It is important at this stage to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. It is therefore unclear how the TCPA principles can be reconciled with the NPPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment.

Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "The Art of Building a Garden City" does provide a further level of detail, particularly with regards to the siting of new settlements. This publication states that,

"locations for new garden cities should not only avoid damaging areas that are protected for their ecological, landscape, historic or climate- resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration of sites for new garden cities or towns should be the extent to which each one ... will allow for positive impacts on assets of historic value".

(Emphasis added, pg. 100)

In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment.

**Change suggested by respondent:**

In preparing for a new settlement we strongly advise that sufficient evidence in relation to the historic environment (including a Heritage Impact Assessment) is prepared to assist in the new settlement site selection process.

Policy 7.6 could make it clear what types of evidence will be needed, including heritage impact assessment.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23977

Object

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**Site Assessment Booklets and Studies, • Introduction and Methodology**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

General comment on site assessment booklets for site allocations and lack of Heritage Impact Assessments Unsound  
At the regulation 18 consultation and in subsequent discussions with the Council, we have made it clear that we did not consider there to be sufficient evidence in relation to the historic environment to support the site allocations.

We understand that the HEELA and some site assessments have been revisited during the last year. Prepare HIAs for particular sites identified below prior to EiP. However, we have reviewed a number of the assessments, both in the HEELA and also the site assessment booklets. Whilst we see that some of the HEELA and site assessments have been revisited, we still find the assessments lacking.

Unfortunately, the assessments do not follow the five step methodology for site allocations set out in our Advice note 3 on site allocations. <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement.

This is particularly concerning for the sites where we suggested that more detailed Heritage Impact Assessment (HIA) was required (and indeed, we had understood that it was the Council's intention to undertake this work when we met with them last year).

In our view, the key sites requiring HIA are: GNLP0409R, GNLP3053 GNLP3054, GNLP 0506, GNLP0125, GNLP2143, GNLP2019 and GNLP0133B and D.

The Plan now includes a number of new sites and we would also recommend an HIA for the following new sites GNLP0596R , GNLP 0253 and GNLP0581/2043.

We appreciate that there were various reasons why the Councils did not undertake this work prior to consultation on the Regulation 19 Plan.

However, we continue to advise that these HIAs should be prepared; this is imperative to ensure a robust evidence base for the Local Plan. These should be prepared in advance of the EiP. This is a matter of priority, given the timetable for the Plan.

The HIAs should assess the suitability (or otherwise) of each area for development and the impact on the historic environment. The HIA should consider the issue of the capacity of the site including issues in relation to height and the impact on the historic environment.

Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and ideally a strategy diagram which expresses the development criteria in diagrammatic form.

We would remind you that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed.

**Change suggested by respondent:**

Prepare HIAs for particular sites identified below prior to EiP.

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

## 23978

## Support

### East Norwich, 2.8

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the references in the supporting text to heritage at paragraphs 2.8, 2.10(vii), 2.13, 2.18-2.21.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

## 23979

## Object

### Utilities, 0360/3053/R10 Policy

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

The Deal Ground includes a grade II listed bottle kiln and the southern portion of the site lies within the Trowse Millgate Conservation Area.

The Carrow Works site lies within the Bracondale Conservation Area. The site includes the Scheduled Monument, Carrow Priory and grade I listed Carrow Abbey, as well as several grade II listed buildings including Carrow House and several Carrow Works buildings. There are also a number of grade II buildings nearby on the opposite side of Bracondale.

Any development of these sites has the potential to affect these designated heritage assets and their settings.

We are very concerned about the very high number of dwellings (4000, rather than previously 2000 in Reg 18 Plan) anticipated from this area. Further comments on this are given at Appendix A of our comments. This is likely to give rise to very high density development on the sites, which may have a harmful impact on the historic environment.

We continue to strongly advise that the HIA should be prepared for the whole site ahead of the EiP to inform the allocation and in particular the capacity of the site. The HIA should inform the masterplan required under policy 7.1. Will the masterplan be adopted as SPD?

We are pleased to see that this policy now includes reference to heritage assets at criterion 6.

We suggest that the first sentence is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.

In the third sentence, the wording for the conservation areas should be amended to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas'

We welcome criterion 12 in relation to archaeology. Deal Ground

We broadly welcome criterion 3 but suggest that the phrase 'and reuse encouraged' be replaced with 'required together with a future maintenance scheme for the asset'.

**Carrow Works**

The reference to demolition of locally listed buildings in bullet point one would appear to be unhelpful and gives the wrong emphasis in relation to conservation and enhancement of heritage assets. We suggest that this second sentence is reframed in a more positive manner to more closely reflect the NPPF. There are a number of unlisted former Colman's industrial buildings on site that are of some historic interest. The potential to retain and adapt these buildings should be identified at para 2.10 vii on page 8.

We are particularly concerned about this site, given the heritage assets within this site.

**Utilities Site**

We welcome bullet point one which acknowledges the heritage significance of the site.

**ATB Lawrence Scott**

It is not entirely clear where the ATB site is and there is no separate subheading for this area of the site. Is this a new site?



**Change suggested by respondent:**

We continue to strongly advise that an HIA is prepared for the area now ahead of the EIP. This should also be used to inform the site capacity, the policy wording and the development of the masterplan for the Area.

**Criterion 6**

Reorder the sentences, moving the first sentence to the penultimate sentence.

Amend wording in third sentence to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas'

**Deal Ground**

In criterion 3, replace 'repair and reuse with be encouraged' with 'repair will be required together with a future maintenance scheme for the asset'.

**Carrow Works**

Re-frame second sentence of Carrow works bullet point 1 in a more positive manner to more closely reflect the NPPF.

Add subheading for ATB site

Add ref at para 2.10 vii to unlisted Colman's industrial buildings of historic interest and the potential retain and adapt these.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23980

Object

**Policy 0068, Policy 0068****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes to policy and the addition of criterion 3 in relation to heritage assets. The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.

**Change suggested by respondent:**

Include reference to the Area of Main Archaeological Interest into the Policy

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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23981

Object

**Policy 0133BR, Policy 0133BR****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We very much welcome the wording at criterion 2 in relation to heritage.

We continue to suggest that a detailed HIA is prepared for the campus as a whole to inform future development and the impact on the historic environment.

**Change suggested by respondent:**

Continue to suggest HIA for campus as a whole now ahead of the EiP.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23982

Object

**Policy 0133DR, 0133DR Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Criterion 2 has been very much improved by reference to heritage assets. We suggest replacing respect with 'conserve and enhance the heritage significance. We also suggest inserting a comma after Terraces.

We continue to suggest that a detailed HIA is prepared for the campus as a whole to inform future development and the impact on the historic environment.

**Change suggested by respondent:**

We suggest replacing respect with 'conserve and enhance the heritage significance. We also suggest inserting a comma after Terraces.

Continue to suggest HIA for campus now ahead of EIP.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
 Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>  
 Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23983

Support

**Policy 0282, 0282 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Policy GNLP0282 Land at Constitution Motors Sound Welcome bullet point 1 and reference to locally listed building.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
 Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>  
 Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23984

Support

**Policy 0401, Policy 0401****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the new wording in criterion 2 in relation to heritage assets.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23985

Object

**Policy 0409AR and BR, Policy 0409AR****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the reference to the heritage assets in paragraphs 2.56 – 2.62.

We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.

Criterion 3

Should read character or appearance in line with legislation

The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.

Again we suggest a more detailed HIA is prepared for this site.

**Change suggested by respondent:**

Criterion 2

Reorder the sentences, moving the first sentence to the penultimate sentence

Criterion 3 Change to 'character or appearance'

Include reference to the Area of Main Archaeological Interest into the policy

Prepare HIA for site now ahead of EIP

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23986

Object

**Policy 0409AR and BR, Policy 0409BR**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

Criterion 2 would be improved by using the phrase 'conserve and enhance the significance of heritage assets (including any contribution made to that significance by setting)'

Again continue to suggest a more detailed HIA is prepared for this site.

**Change suggested by respondent:**

Amend criterion 2 to include 'conserve and enhance the significance of heritage assets (including any contribution made to that significance by setting)'

Prepare HIA for site now ahead of EiP

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23987

Object

**Policy 0451, 0451 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Policy GNLP04 51 Land adjoining Sentinel House (St Catherine's Yard) Surrey Street Norwich Unsound We broadly welcome the revised wording in relation to heritage at criterion 1.

We suggest the addition of the words 'the significance' after 'enhances'.

The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.  
Criterion 1

add the words 'the significance' after 'enhances'.

Include reference to the Area of Main Archaeological Interest into the policy.

**Change suggested by respondent:**

Criterion 1

add the words 'the significance' after 'enhances'.

Include reference to the Area of Main Archaeological Interest into the policy.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23990

Support

**Policy 2114, 2114 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes made to the policy wording to include specific reference to heritage assets.

**Change suggested by respondent:**

-

**Legally** Not specified

**compliant:**

**Sound:** Yes

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23988

Object

**Policy 0506, 0506 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We continue to have significant concerns about this allocation – in particular the scale of the allocation and potential to cause harm to the historic environment.

**Site capacity – dwellings**

We note that the capacity of the site has been reduced to 800 dwellings in response to the Secretary of State's decision in relation to this site.

We have previously commented that the capacity of the planning 2018 application site would be closer to 600 dwellings. This was, in part, based on the work undertaken by Ash Sakula <https://www.ashsak.com/projects/anglia-square-norwich> that put forward a worked illustration of how Anglia Square could be redeveloped so as to provide the facilities required, within a new community in a sustainable manner that conserves and enhances the historic environment and restores the former street pattern of the area.

We therefore continue to advise that in our view 600 dwellings should be the maximum for the site.

It is not clear from the policy wording what scale of other development can be accommodated on site.

A heritage impact assessment should be undertaken prior to EIP to inform the allocation and policy wording. This could in part draw on some of the work done by Ash Sakula, but needs to look more broadly at the impact of potential development as expressed in the allocation (rather than simply the previous application) upon the significance of heritage assets, consider the capacity of the site including issues of height. Without an HIA, the allocation is not sufficiently justified as the potential impact on the historic environment has not been sufficiently assessed.

**Criterion 5 and 9**

Car parking – owing to its central location, car parking should be kept to a minimum on the site. We welcome the reference to low car or car free residential development but remain concerned about the reference to decked parking for the retail element. In our view,

Amend site capacity to 600 dwellings as a maximum.

**Criterion 5**

Delete criterion 5 in relation to car parking for the district centre.

**Criterion 6**

Add the following sentence to the criterion: 'Any landmark building should not achieve this status through height exceeding that of existing buildings that from the immediate context of the site.'

**Criterion 7**

Add the words 'including those' before 'at Magdalen Street'.

Add sentence to read, 'The density of development to reflect the wider character and grain of the area.'

**Criterion 11**

Add sentence to read 'Reinstatement of historic street pattern.'

Include reference to the Area of Main Archaeological Interest into the policy.



**Change suggested by respondent:**

Prepare an HIA prior to EIP to inform the site capacity (residential and other uses), potential mitigation and enhancement and policy wording.

Amend site capacity to 600 dwellings as a maximum.

**Criterion 5**

Delete criterion 5 in relation to car parking for the district centre.

**Criterion 6**

Add the following sentence to the criterion: 'Any landmark building should not achieve this status through height exceeding that of existing buildings that from the immediate context of the site.'

**Criterion 7**

Add the words 'including those' before 'at Magdalen Street'.

Add sentence to read, 'The density of development to reflect the wider character and grain of the area.'

**Criterion 11**

Add sentence to read 'Reinstatement of historic street pattern.'

Include reference to the Area of Main Archaeological Interest into the policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23989

Object

**Policy 1061R, 1061R Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

This would appear to be a new site.

There are no heritage assets within the site boundary. However, to the north west of the site lies the Horsham St Faith Conservation Area and a number of associated listed buildings including the grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings. Development on the airport site has the potential to impact upon these heritage assets.

To that end, we suggest that a criterion is added to the policy to conserve and enhance the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to tier significance by setting).

**Change suggested by respondent:**

GNLP10 61R Land known as Site 4, Norwich Airport Unsound This would appear to be a new site.

There are no heritage assets within the site boundary. However, to the north west of the site lies the Horsham St Faith Conservation Area and a number of associated listed buildings including the grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings. Development on the airport site has the potential to impact upon these heritage assets. Add criterion to the policy to conserve and enhance the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to tier significance by setting)

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23991

Support

**Policy 2163, 2163 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes made to the policy wording to include specific reference to heritage assets, grain and massing and archaeology on this site. Paragraph 2.85 also provides helpful supporting text in relation to heritage.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23992

Support

**Policy 2164, 2164 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

GNLP 2164 Land west of Eastgate House, Thorpe Road Sound We welcome the reference to the Conservation Area in this policy.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23993

Object

**Policy 3054, 3054 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

Again we suggest a more detailed HIA is prepared for this site.

The supporting text at paragraphs 2.93 - 2.98 provide helpful context in relation to heritage and the site.

We note that reference is made to a heritage statement and heritage impact assessment in paragraph 2.95. However, we continue to suggest that the HIA should be prepared ahead of the EiP to inform the allocation.

**Criterion 1**

Should read character or appearance in line with legislation

**Criterion 2**

We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.

The final sentence of this is not quite right - significance can in part be derived from setting. The sentence would be better if it read 'conserve and enhance significance of the designated and non- designated heritage assets both on-site and off-site (including any contribution made to that significance by setting).

We welcome criteria 3,4 and 6

**Criterion 5**

Character or appearance rather than and to reflect the legislation

The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.

**Change suggested by respondent:**

GNLP30 54 St Marys Works and St Marys House (150 dwellings and hotel) Unsound Again we suggest a more detailed HIA is prepared for this site.

The supporting text at paragraphs 2.93 - 2.98 provide helpful context in relation to heritage and the site.

We note that reference is made to a heritage statement and heritage impact assessment in paragraph 2.95. However, we continue to suggest that the HIA should be prepared ahead of the EiP to inform the allocation.

**Criterion 1**

Should read character or appearance in line with legislation

**Criterion 2**

We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph. Prepare HIA for site now ahead of EiP

**Criterion 1**

Should read character or appearance in line with legislation.

**Criterion 2**

We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.

The final sentence of this is not quite right – setting can be part of significance. The sentence would be better if it read ‘conserve and enhance significance of the designated and non-designated heritage assets both on-site and off- site (including any contribution made to that significance by setting).

**Criterion 5**

Character or appearance rather than and

Include reference to the Area of Main Archaeological Interest into the policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23994

Object

**CC2, Policy CC2****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome criterion 2 that references the Conservation Area and listed buildings. It would be helpful to specifically identify some of the key listed buildings including the Grade I listed Church of St John de Sepulchre and other nearby grade II listed buildings.

The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.

**Change suggested by respondent:**

Include reference to the Area of Main Archaeological Interest into the policy.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23995

Support

**CC3, CC3 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes made to this policy to include criteria 2, 3 and 7 which reference heritage assets and archaeology.

**Change suggested by respondent:**

-

**Legally** Not specified

**compliant:**

**Sound:** Yes

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23996

Support

**CC4, CC4A Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes made to this policy at criterion 4 to reference adjacent heritage assets.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23997

Support

**CC4, CC4B Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome criteria 3, 4 and 5 of this policy which reference heritage assets. It will be important that density and scale of development on this site properly reflects the character of the Conservation Area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23998

Object

**CC7, CC7 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome bullet point 2 that relates to sensitive conversion of historic buildings, bullet point 3 which refers to the Conservation Area and listed buildings and bullet point 6 in relation to heritage interpretation.

The supporting text mentions that archaeological assessment will be required. This requirement should also be included in the policy.

**Change suggested by respondent:**

Include criterion in relation to archaeological assessment in policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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23999

Object

**CC8, CC8 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome criteria 1, 2 and 4 of the policy which relate to historic street frontage, the Conservation Area and listed buildings, scale and form of development and locally listed structures.

The supporting text mentions that trial trenching will be required prior to development. This requirement should also be included in the policy.

**Change suggested by respondent:**

Include criterion in relation to trial trenching in policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24000

Object

**CC10, CC10 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes to the policy to include reference to the Conservation area and listed buildings at criterion 1 (criterion 2 is the same as criterion 1. Delete criterion 2).

We welcome criterion 4 in relation to archaeology.

**Change suggested by respondent:**

Delete criterion 2.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24001

Object

**CC11, CC11 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the addition of criterion 1 that specifically mentions the conservation area and listed buildings.

The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy.

**Change suggested by respondent:**

Include criterion in relation to archaeological investigation in policy

**Legally** Not specified

**compliant:**

**Sound:** Yes

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24002

Support

**CC13, CC13 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the inclusion of criteria 1 and 2 in relation to scale and massing and also impact on nearby conservation areas.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24003

Object

**CC15, CC15 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

This site is located adjacent to the St Matthews Conservation Area. There are also two grade II listed buildings to the north of the site (The Coach and Horses public house and 60 Throe Road). The nearby station is also grade II listed.

We welcome mention of the conservation area in the policy at criterion 1.

The policy should also mention the listed buildings.

**Change suggested by respondent:**

Include reference to the listed buildings in the policy and supporting text.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24004

Support

**CC16, CC16 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes to this policy to include criterion 2 that specifically references the Bracondale Conservation Area and nearby listed buildings including Carrow Priory and Boom Towers.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24005

Object

**CC18 (CC19), CC18 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

POLICY CC18 (CC19) Land at 140-154 Oak Street and 70-72 Sussex Street Unsound We welcome the changes to criterion 1 to include specific reference to the grade II listed Great Hall.

The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy. Include criterion in relation to archaeological assessment in policy.

**Change suggested by respondent:**

Include criterion in relation to archaeological assessment in policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24006

Object

**CC24, CC24 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome criteria 1, 2 and 4 and in particular welcome the reference to height in criterion 2.

The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.

**Change suggested by respondent:**

Include criterion in relation to archaeological assessment in policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
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24007

Object

**CC30, CC30 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

POLICY CC30 Westwick Street Car Park Unsound We welcome the revisions to criteria 2 and 5 to specifically reference listed buildings, the City Centre Conservation Area scheduled monument and scale and massing as well as heritage interpretation.

The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy. Include criterion in relation to archaeological assessment in policy.

**Change suggested by respondent:**

Include criterion in relation to archaeological assessment in policy.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
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24008

Support

**R7, R7 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome reference in bullet point 2 of the policy to the church and the locally listed residential terraces.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24009

Object

**R13, R13 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the inclusion of bullet point 2 in the policy but continue to suggest that reference should also be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.

**Change suggested by respondent:**

POLICY Site of former Unsound We welcome the inclusion of bullet point 2 in the policy but Reference should also be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24010

Support

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**R14/R15, R14/15 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the reference to the City Centre and St Mathew's conservation areas as well as the Thorpe Hamlet conservation area. We welcome criterion 3 in relation to important views.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24011

Support

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**R17, R17 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the reference to the locally listed shoe factory building in the policy.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24012

Support

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**R20, R20 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

POLICY R20 Land east of Starling Road Sound We welcome bullet point 2 of the policy that references the Conservation Area and locally listed terraces.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24013

Support

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**R31, R31 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the changes to criterion 2 to specifically reference St Bartholomew's Church and the various locally listed buildings.

We welcome criterion 9 relating to archaeological assessment.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24014

Support

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**R33, R33 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome reference to Earlham Cemetery in criterion 1 and to heritage interpretation at criterion 5.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24015

Support

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**R36, R36 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome bullet point 1 of the policy that references the Conservation Area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24016

Support

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**R37, R37 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

Policy R37 The Norwich Community Hospital site,  
Bowthorpe Road, Sound We welcome the changes to the policy wording to make specific reference to the Earlham  
Cemetery Registered Park and Garden and listed Jewish Mortuary Chapel.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
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24017

Support

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**R38, R38 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>  
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24018

Support

**R42, R42 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24019

Support

**COL1, COL1 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

COL1 - Land adj to Norwich Research Park, We welcome the addition of criterion 16 and 19 in relation to heritage assets and archaeology.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24020

Support

**Policy COL2/0140C, COL2/0140C Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

COL2 GNLP 0140C - Colney Strategic Employment Area We welcome the addition of criterion 1 in relation to heritage assets

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24021

Object

**Policy 0253, 0253 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Colney Hall is located at the heart of this allocation. Colney Hall is a late 18th century house with attached orangery listed at grade II. The allocation is for specialist housing for older people, university research and healthcare facilities.

We note that criterion 4 refers to sensitive conversion of the Grade II listed Hall and its gardens. We also note and welcome criterion 6 in relation to archaeology.

Given the scale of this development and the fact that development would surround the listed building, we suggest that an HIA is prepared to assess the suitability of the site and to inform any policy wording.

**Change suggested by respondent:**

We suggest a detailed HIA is undertaken for this site prior to EiP to assess the suitability or otherwise of the site and consider any appropriate mitigation.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24022

Support

**Policy BAW2, BAW2 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome criterion 2 regarding the conservation management plan.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24023

Support

**KES2/0497, KES2 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

KES 2 Land west of Ipswich Road We welcome the changes made to include criterion 8 in relation to the grade II listed church and remains of the Church of All Saints.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24024

Support

**Policy DRA1, DRA1 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the addition of the last two sentences of this policy that refer to the grade II listed 4 Manor Farm Close.

We note the policy needs formatting with numbered bullets.

**Change suggested by respondent:**

Format with numbered bullets

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24025

Support

**Policy EAS1, EAS1 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

EAS1 Land south and east of Easton - Welcome criteria 8 and 9 and particularly the changes to 9 to make specific reference to St Peters Church.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24026

Support

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**Policy HEL1, HEL1 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

HEL 1 Land at Hospital grounds - Welcome bullet point 4

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24027

Support

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**Policy 0172, 0172 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the changes to criterion 6 to make it absolutely clear that land to the west of the A1270 should only be used for open space and to conserve and where opportunities arise enhance the grade II listed Rackheath Hall and bridge.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24028

Support

**Policy 0132, 0132 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Although Rackheath Hall, grade II listed lies to the east of the site, the intervening vegetation should provide a suitable buffer. We welcome the reference to the historic parkland and need for protection of trees in bullet point 6.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24029

Support

**Policy TROW1, TROW1 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes made to this policy to include specific reference to the Trowse Conservation Area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24030

Support

**Policy 0311 0595 2060, 0311 0595 2060 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the change at bullet point 8 to specifically reference Bure Valley Farmhouse.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24031

Object

**Policy 0596R, 0596R Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

This is a new site. Diggens Farmhouse, listed at grade II, lies to the east of the site. We welcome criterion 8 that specifically references the asset but suggest that mention should also be made of the need to include open space and landscaping at the eastern end of the site to protect the significance of the asset.

Given the proximity of the Farmhouse we suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of this heritage asset, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. This HIA should be completed in advance of the EIP. If the site is found suitable, the findings of the HIA should then inform the policy wording.

**Change suggested by respondent:**

Include a requirement for open space and landscaping at the eastern end of the site.

We suggest a detailed HIA is undertaken for this site prior to EIP to assess the suitability or otherwise of the site and consider any appropriate mitigation.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24032

Support

**Policy 2108, 2108 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Policy

GNLP21 08 Land south of Spirketts Lane We welcome the changes to criterion 4 to reference the listed buildings

**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

24033

Object

**Policy 2109, 2109 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

GNLP 2019 South of Hethel Industrial Unsound Whilst we welcome the reference to the grade II listed building at criterion 4, the policy needs to say that there is a need to conserve We continue to suggest a detailed

HIA is undertaken for this site prior to and where appropriate enhance the significance of the heritage asset including any contribution made to that significance by setting. It is more than just protecting residential amenity.

We continue to suggest a detailed HIA is undertaken for this site to assess the suitability or otherwise of the site and consider any appropriate mitigation.

**Change suggested by respondent:**

GNLP 2019 - South of Hethel Industrial. Whilst we welcome the reference to the grade II listed building at criterion 4, the policy needs to say that there is a need to conserve We continue to suggest a detailed

HIA is undertaken for this site prior to GNLP 2019 South of Hethel Industrial Unsound Whilst we welcome the reference to the grade II listed building at criterion 4, the policy needs to say that there is a need to conserve We continue to suggest a detailed HIA is undertaken for this site prior to

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24034

Object

**Policy HETHEL 2, HETHEL 2 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Whilst there are no designated heritage assets within the site boundary, the grade II listed Little Potash/Brunel House and Corporation Farmhouse lie to the east of the site.

There is currently no mention of these heritage assets in the policy or supporting text or of the need to conserve and enhance the significance of the heritage assets (including any contribution made to that significance by setting). We suggest that the policy be amended to refer to these heritage assets and the need to conserve and enhance them and also to the need for appropriate landscaping along the eastern edge of the site.

**Change suggested by respondent:**

We continue to suggest that the policy be amended to refer to these heritage assets and the need to conserve and enhance them and also to the need for appropriate landscaping along the eastern edge of the site.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24035

Support

**Policy 0354R, 0354R Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome bullet point 4 relating to listed buildings and the Conservation Area.

**Change suggested by respondent:**

-

**Legally** Not specified

**compliant:**

**Sound:** Not specified

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24036

Support

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**Policy BLO1, BLO1 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 2 that references the grade II listed Manor Farm Barn to the south of the site.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24037

Support

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**Policy HET1, HET1 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the reference to archaeology at criterion 18.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24038

Support

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**Policy 0520, 0520 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 9 to reference the two grade II listed buildings (Lilac Farmhouse and Blenheim Cottage) to the south of the site.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24039

Support

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**Policy HIN2, HIN2 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 4 to reference the grade II listed Alexander's Farmhouse lies to the east of the site and White Lodge, also listed at grade II lies to the north of the site.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24040

Support

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**Policy 0312, 0312 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 3 to reference the listed buildings and conservation area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24041

Support

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**Policy 0463R, 0463R Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 2 to reference the listed buildings and Langley Park registered park and garden.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24042

Support

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**Policy COL2, COL2 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 4 to reference the nearby listed limekiln and conservation area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24043

Support

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**Policy 0605, 0605 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 2 to reference the nearby listed buildings and conservation area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24044

Support

**Existing allocations to be carried forward, FOU2 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 6 to reference the nearby conservation area.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24045

Support

**Policy FRE1, FRE1 Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

We welcome the addition of criterion 4 to reference the nearby listed buildings and requirement for landscaping along the northern boundary.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24046

Support

**Policy 0608R, 0608R Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the reference to the listed building at criterion 3.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24047

Object

**Policy 0125R, 0125R Policy**

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

**Summary:**

This site lies to the east of the Horsham St Faith Conservation Area and its associated listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew as well as St Faith Priory which is a scheduled monument. Any development of the site has the potential to impact upon the setting of these heritage assets.

This is a sensitive site in terms of the potential impact upon these multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site.

We note and welcome the reference to the church, scheduled Priory and conservation area in bullet point 4.

We do however continue to suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. This HIA should be completed in advance of the EIP. If the site is found suitable, the findings of the HIA should then inform the policy wording.

**Change suggested by respondent:**

We suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EIP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24048

Support

**Policy HNF1, HNF1Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the addition of criterion 6 to reference the nearby listed buildings and requirement for landscaping along the eastern boundary.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24049

Support

**Policy SL2007 4016 HFN3, SL2007 4016 HFN3 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

This site is separated from Horsham St Faith and its Conservation Area and listed buildings by the existing industrial estate.

Nevertheless, given the proximity of the scheduled St Faith Priory, this area is of archaeological sensitivity. To that end we welcome the reference at bullet point 3 in relation to archaeology.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

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24050

Object

**Marsham, 2143 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings to the east of the site including the grade I listed Church of All Saints and the grade II listed Old Rectory, Colenso Cottage and Marsham War Memorial.

We welcome the amended wording at criterion 3 to reference other heritage assets.

This is a sensitive site in terms of the potential impact upon these multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site.

We therefore continue to suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.

It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.

**Change suggested by respondent:**

We suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.

It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24051

Support

**Policy 3003, 3003 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the reference to the non-designated heritage asset.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24052

Support

**South Norfolk - Non residential, BKE3 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes made to criterion 2 in relation to landscaping and boundary treatment. We also welcome the addition of bullet point 3 in relation to Arlington Hall.

We suggest that the bullet points are numbered for consistency with the rest of the Plan.

**Change suggested by respondent:**

Number the bullet points for consistency with rest of Plan.

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24530

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

There is still no reference to Historic Landscape Characterisation in the Policy. We again suggest adding reference (policy and text) to HistoricLandscape 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 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.

**Change suggested by respondent:**

Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

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24053

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

Whilst there are no designated heritage assets within the site boundary, the grade II\* listed Lodge Farmhouse lies to the south of the site. To the south west of the site lies the Bawburgh Conservation Area. This includes the grade I listed church of St Mary and St Wulfstan, grade II\* listed Church Farmhouse, The Hermit's House and the Slipper Chapel, together with a number of grade II listed buildings. There are also three scheduled monuments (Bawburgh Bridge and two garden houses near the Hall). Any development of the site has the potential to impact upon the setting of these heritage assets.

This is a very large site for development and therefore the scale of the development may have an impact on these sites. Whilst we consider it likely that the site could accommodate development, we suggest that a Heritage Impact Assessment should be undertaken in advance of the EiP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.

It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.

**Change suggested by respondent:**

We suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.

It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

24531

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

It is important that your plan is underpinned by appropriate evidence.

We would continue to recommend that you review the list of types of evidence that we outlined to you in our Reg 18 response. We advise you to carefully consider the list we sent through (see letter dated 16.3.20).

There would appear to be a lack of heritage evidence to date. It is important that your plan is built on a sound and robust evidence base.

Any evidence base should be proportionate.

In particular we would highlight the need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.

We advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and to show how that has translated into the policy choices you have made. Do this from the start, as a working document, that you add to throughout the plan preparation process, not just before EiP.

**Change suggested by respondent:**

Ensure sound evidence base for the historic environment in advance of EiP

- a) Prepare a topic paper for the historic environment
- b) Prepare HIAs for selected sites
- c) Prepare taller buildings study to inform strategy
- d) Prepare capacity of sites evidence base document

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>



24532

Object

**East Norwich, 333****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We recognise the opportunities provided in East Norwich for brownfield regeneration.

However, one of our key concerns in this area relates to Carrow Works (Abbey/Priory). We have set out in more detail our concerns in Appendix B in relation to this site but in summary, we question the capacity of the site and suggest that a more detailed Heritage Impact Assessment be undertaken before the next draft of the Plan to inform the suitability or otherwise of the site, the likely impact of development upon the significance of heritage assets, the extent of the developable area and hence capacity of the site, any necessary mitigation or enhancements that could be made and then any changes required to policy wording.

**Change suggested by respondent:**

Undertake detailed HIA for Carrow Works site and wider East Norwich area

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

24535

Support

**Policy HAR5, HAR5 Policy****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We welcome the changes to criterion 4 to reference the listed buildings

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

24533

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, 304****Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]**Summary:**

We still consider that there is a need for a taller buildings policy to be included in the GNLP Plan. This should be based on a study/evidence base that looks not only at your existing policy framework but that also explores the issue of the wider city skyline. In our view, this is a key policy area that needs to be addressed in the strategic Plan.

We appreciate that you have now included some reference to height at Policy 7.1 in relation to City Centre criterion 5 which is welcome. However, the issue relating to height is not exclusive to the City Centre area.

We understand from our meetings that you are not proposing to address this issue through the Greater Norwich Local Plan but instead Norwich City are considering doing a 3D modelling study of the City and update to the Conservation Area appraisal. We understand that this work is likely to feed into future Development Management Local Plan revisions, or a plan under the proposed new system, rather than the current GNLP.

However, in our view this is insufficient, particularly given the current growth pressures in Norwich. We continue therefore to recommend that a tall buildings study is undertaken to provide the evidence base and contribute towards the development of an appropriate tall(er) buildings policy for this Plan. Ideally this should also consider the question of massing.

The study should investigate the important key views of the city, the skyline as a whole and the contribution that makes to the Conservation Areas and the wider historic environment. It should establish if there is scope for tall(er) buildings and if so where and where not.

Our advice note in relation to tall buildings provides further guidance in this respect

Tall buildings – Advice Note 4

<https://historicengland.org.uk/images-books/publications/tall-buildingsadvice-note-4/>

A revision of our advice note is was out for public consultation last year.

<https://historicengland.org.uk/whats-new/news/tall-buildings-adviceconsultation/>

The Plan should then include a policy for taller buildings and the skyline

**Change suggested by respondent:**

Undertake evidence base study on tall(er) buildings, massing and the skyline.

Include policy for tall(er) buildings and the skyline in the Plan.

We would be happy to explore this matter with you further.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

24534

Object

## Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets

**Respondent:** Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]

### Summary:

In our comments we have raised concerns about the indicative capacity of a number of sites.

Whilst we consider that it will be possible to achieve high densities on brown field sites compared with the densities of many parts of the city, it would not be appropriate to seek the densities associated with very tall buildings in metropolitan areas.

We appreciate the emphasis in national policy on high density development in sustainable locations but highlight paragraph 11b and footnote 6 of the NPPF which states that there may be circumstances where the application of policies in the framework that protect areas or assets of particular importance (including designated heritage assets) provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.

Historic England consider that Norwich's historic character is under pressure from recent developments and also the scale of growth envisaged by this Plan.

One of the first questions any Inspector will ask at EiP concerns the capacity of the sites to accommodate the level of development indicated in the Plan.

To that end 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 consider whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors).

### Change suggested by respondent:

Prepare an evidence document on site capacities in advance of the EiP

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Cover Letter - <https://oc2connect.gnlp.org.uk/a/483>

Appendix A - Comments on Policies - <https://oc2connect.gnlp.org.uk/a/484>

Appendix B - Comments on Allocations - <https://oc2connect.gnlp.org.uk/a/485>

23461

Object

**Communities, 132****Respondent:** Ms Catherine Maclennan [19876]**Summary:**

I believe that this plan is not legally compliant because of the lack of consultation. I believe that the period of time for public consideration and reduced discussion has been reduced. The fact that this decision was made in the absence of opposition councillors has resulted in the process appearing underhand and unreliable. There is an unprecedented situation of a global pandemic that has resulted in obvious restrictions on social interaction and movement, it would appear that Broadland Council have exploited this situation to prevent transparency and the democratic process.

**Change suggested by respondent:**

1. A appropriate period for public consultation and review, once the lockdown situation has eased and a public meeting can be held and a working party formed.
2. That Broadland Council publishes its plans in detail for increasing the number of both primary and secondary school places.
3. That Broadland Council publishes its plans in detail to provide appropriate surgeries, general practitioners and health care workers.
4. That Broadland Council publishes its plans to provide information as to adequacy of the sewerage system for the town and environs.
5. That Broadland Council publishes information regarding the adequacy of the water table and its suitability for such a significant growth of population.
6. That Broadland Council publishes its plans for an increase in car parking and shops within Aylsham.
7. That Broadland Council publishes information regarding the creation of pavements and street lighting.
8. That Broadland Council publishes forecasts and proposals for the increase in traffic in and around the town and into Norwich.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23462

Object

**Infrastructure, 142****Respondent:** Ms Catherine Maclennan [19876]**Summary:**

I believe that this plan is not legally compliant because of the lack of consultation. I believe that the period of time for public consideration and reduced. discussion has been reduced. The fact that this decision was made in the absence of opposition councillors has resulted in the process appearing underhand and unreliable There is an unprecedented situation of a global pandemic that has resulted in obvious restrictions on social interaction and movement, it would appear that Broadland Council have exploited this situation to prevent transparency and the democratic process.

**Change suggested by respondent:**

1. A appropriate period for public consultation and review, once the lockdown situation has eased and a public meeting can be held and a working party formed.
2. That Broadland Council publishes its plans in detail for increasing the number of both primary and secondary school places.
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6. That Broadland Council publishes its plans for an increase in car parking and shops within Aylsham.
7. That Broadland Council publishes information regarding the creation of pavements and street lighting.
8. That Broadland Council publishes forecasts and proposals for the increase in traffic in and around the town and into Norwich.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23463

Object

**Infrastructure, 143****Respondent:** Ms Catherine Maclennan [19876]**Summary:**

I believe that this plan is not legally compliant because of the lack of consultation. I believe that the period of time for public consideration and reduced. discussion has been reduced. The fact that this decision was made in the absence of opposition councillors has resulted in the process appearing underhand and unreliable There is an unprecedented situation of a global pandemic that has resulted in obvious restrictions on social interaction and movement, it would appear that Broadland Council have exploited this situation to prevent transparency and the democratic process.

**Change suggested by respondent:**

1. A appropriate period for public consultation and review, once the lockdown situation has eased and a public meeting can be held and a working party formed.
2. That Broadland Council publishes its plans in detail for increasing the number of both primary and secondary school places.
3. That Broadland Council publishes its plans in detail to provide appropriate surgeries, general practitioners and health care workers.
4. That Broadland Council publishes its plans to provide information as to adequacy of the sewerage system for the town and environs.
5. That Broadland Council publishes information regarding the adequacy of the water table and its suitability for such a significant growth of population.
6. That Broadland Council publishes its plans for an increase in car parking and shops within Aylsham.
7. That Broadland Council publishes information regarding the creation of pavements and street lighting.
8. That Broadland Council publishes forecasts and proposals for the increase in traffic in and around the town and into Norwich

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23846

Support

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** Taylor Wimpey (Mr Jordan Marshall, Strategic Land Manager) [19795]**Summary:**

Whilst we do not object to the contingency site in principle, we feel the trigger point is onerous to the extent that the site will not become a formal allocation until undersupply has reached a very high level. In our view greater flexibility should be built into the policy to allow for a more proactive approach in addressing a shortfall. Allocating smaller schemes which are immediately available and deliverable in order to meet under supply, such as Land south of Townhouse Road. See red line plan attached.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Concept Masterplan.pdf - <https://oc2connect.gnlp.org.uk/a/46m>

24318

Object

**Policy 0253, 0253 Policy****Respondent:** Mr graham martin [19999]**Summary:**

1. Policy GNLP0253

1a. Summary of Conclusions

Colney Hall is outside the approved 2015 Local Plan limit of development and development would have significant negative impacts on protected landscapes.

Colney parish objected to the inclusion of Colney Hall in 2018. Significant constraints have been identified under Housing and Economic Land Availability Assessment (HELAA). The proposal did not perform well scoring double negatives in a Sustainability Appraisal ( SA)

The facility proposed in the GNLP 0253 is not required to be located near the research park .

The 80 beds and 120 units of extra care housing is likely to add thousands more traffic movements on the B1108 an already congested road and would seriously impede through traffic to and from Norwich, UEA, the NNUH and the Research Park.

The Colney Hall 0253 proposal should be removed from the proposed GNLP 2021

1b Colney Hall Constraints

Colney a small village with more than 10% new homes, the site of Norwich Research Park, Norfolk and Norwich University Hospital, Spire Hospital, Global Clinic, GreenAcres burial site, two Anglian water substations , a large electricity substation and the Training Ground for Norwich City Football Club.

Parish Plans were announced in the 2000 White Paper and in 2009 a Parish Plan for Colney was produced. In 2015 the local Plan was approved setting the limit of development within the parish.

Colney Hall is outside the 2015 limit of development and development would have significant negative impacts on protected landscapes , the Yare Valley and Southern Bypass Landscape Protection Zone.

Recently, there have applications in Colney for an end of life hospice and the expansion of the GreenAcres site for a further 3600 burial plots. Despite concerns by the parish on flood related issues these applications have been approved subsequent to the GNLP proposals for Colney Hall.

The GNLP 0253 application proposes Colney Hall, (approx. 24.99 ha) is allocated for specialist housing for older people. The site is to accommodate a dementia care unit of approximately 80 beds, approximately 120 units of extra care housing, and the conversion of Colney Hall. This application seems very similar in intent to the Priscilla Bacon Hospice (PBH) 2020/0578 application that has already been approved by South Norfolk Council in 2020.

Objections raised concerns regarding the extra amount of housing already planned for the area, removal of more protected green space and the impacts wildlife biodiversity. Norfolk Wildlife Trust stated constraints relating impacts on existing CWS 235 and impacts on floodplain may be significant and should be recognised as factors potentially making this allocation unsuitable for the proposed development.

Norwich Green Party comments on GNLP0253 and GNLP0158 (land within Yare Valley N of Watton Road) considered this land should be part of a Norwich Greenbelt and therefore protected from significant development so that it is retained as protected green space.

The Housing and Economic Land Availability Assessment (HELAA) for the site indicated a number of constraints relating to Access, Accessibility to Services, Utilities Capacity, Contamination and Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment, Transport and Roads, Compatibility with Neighbouring Uses. A Sustainability Assessment was carried out and the proposal did not perform well scoring double negatives for air quality and noise, climate change mitigation and adaptation, Biodiversity, Geodiversity and GI, Education, Historic Environment and Natural resources, waste and contaminated land

However, although HELAA indicated that a suitable access may be possible, and that impact on local roads could be mitigated. I have found it difficult to find evidence in the GNLP 0253 proposal to support this conclusion. The nearest comparison site is the Priscilla Bacon Hospice 2020/0578 is smaller, 24 beds, and the application shows that the traffic generated would be some 851 movements a day. The GNLP0253 application for 80 beds and 120 units of extra care housing would seem likely to add thousands more traffic movements on the B1108, an already congested road and would seriously impede through traffic to and from Norwich, UEA, the NNUH and the Research Park.

#### **Change suggested by respondent:**

The Colney Hall 0253 proposal should be removed from the proposed GNLP 2021

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** None



24319

Object

**Policy BAW2, BAW2 Policy****Respondent:** Mr graham martin [19999]**Summary:****2. POLICY BAW 2: Bawburgh and Colney Lakes**

Bawburgh and Colney Lakes (approx. 73.5ha) is allocated for a water-based country park.

The 2009 Colney Parish Plan suggested a much less intrusive approach. Involving a network of circular walks linking the communities of Colney, Bowthorpe, Bawburgh, Hethesett, Little Melton, Earlham, UEA, NRP and the NNUH.

The BAW 2 land should be part of a Norwich Greenbelt involving the Yare Valley and protected from significant development so that it is retained as protected green space. Incorporated could be the existing County Wildlife Sites, Local Nature Reserve and possibly GreenAcres and Colney Hall.

This complex could form a important Wildlife Conservation Area with an information center for the wellbeing of local communities

Colney represents in microcosm the issues that face development in the Greater Norwich Area and throughout Norfolk.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24320

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Mr graham martin [19999]

**Summary:****3. Key Issues in the Area of Greater Norwich Local Plan.****3a Housing**

Many residents will recall David Cameron on BBC's Countryfile programme in 2012 stating, "Our vision is one where we give communities much more say, much more control. The fear people have in villages is a great big housing estate being plonked down from above" .

Residents in towns and villages in the Greater Norwich Area and throughout Norfolk regularly learn of such new housing developments planned in their area. Who are these houses for? Certainly not for our local young people trying to own their own home as the so-called affordable homes in the development cost much more than most young people can afford. Developers frequently attempt to reduce the already low numbers of these "affordable homes " still further, arguing if they do not the scheme would not be profitable for the developer!!!!

It is puzzling why developers are still making applications for more development and getting approval by planners when there are some 31,452 un-built commitments in the GNPD area. Technically they are not all planning permissions - they are mainly site allocations in the JCS which will be rolled over into the GNLP)with a presumption therefore that planning permission will be granted.

An excuse often used by developers for new applications was the 5 year land bank requirement from local councils has not been achieved. However, throughout Norfolk the 5 year bank requirement has been achieved so why are some planners still approving new developer applications?

Norfolk is a very attractive county and it is understandable why people wish to live here. A reason suggested is that properties are cheaper in Norfolk. Why are they cheaper? This is because many developments are being built on greenfield sites where land is cheaper. Some developments like the Research Park and the Hospital are necessary but do we need more out of town retail parks and houses on greenfield sites?

A cornerstone of Norfolk's economy is agriculture. Nearly a quarter of the total of the national income comes from farming in the eastern region. Great swathes of productive farmland in Norfolk are going under construction projects. Satellite research showed East Anglian counties have had huge losses of farmland with Norfolk faring worst.

Unneeded and unwanted development is spreading like a cancer in the Greater Norwich Area and around our market towns and villages engulfing farmland when there are tens of thousands of unbuilt houses in approved housing allocations. Planners seem to be allow developers to "cherry-pick" areas for new developments on greenfield sites

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

**24321****Object**


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**Site Assessment Booklets and Studies, Strategic Flood Risk Assessment (SFRA) Level 2**

**Respondent:** Mr graham martin [19999]

**Summary:****3.b Flooding**

What has all this to do with flooding? The recent 2020 floods have been widespread including Norfolk and have raised awareness of flood issues and the risk of development. Around Norwich, for years there have been local and government action plans and flood assessment advising restricting development in most flood risk areas, 2011 Norwich Urban Area Surface Water Management Plan (SWMP); this includes groundwater susceptibility and covers most of Colney and shows the site has high susceptibility to groundwater flooding. 2018 Surface Water Management Action Plan (SWMAP). Department for Environment Food and Rural Affairs 2017 Greater Norwich Strategic Flood Risk Assessment (GNSFRA 2017).

The maps I have for the 1912,1968 and 1993 flood areas are incomplete and have probably been updated. Similarly with the groundwater susceptibility and surface water maps.

I have just read with interest the Greater Norwich level 2 Flood Risk Assessment but I have not been able to view Maps showing,

- a. the extent of historic floods especially for the 1912, 1968 and 1993 events.
- b. Groundwater flood susceptibility in GNLP area.
- c. Surface Water flood areas.

The Level 2 assessment is extremely useful for examining specific sites. These give a series of pictures but a single map linking the all Groundwater flood susceptibility areas in GNLP and one for Surface Water flood areas would give a holistic picture for these matters in the GNLP area.

It is surprising that maps showing the extent of major floods have not been produced.

Unfortunately some planners and developers seem unaware of action plans and flood assessments and applications are approved in flood risk areas. Applications sometimes state flooding of a site once in a hundred years is a fairly unlikely flood event. However, the extent of historic flooding is not only important historically but has implications for development in the present day in river valleys. Around Norwich, for example, in the 1912 flood, houses in Wymondham were severely damaged along with the bridges at Bawburgh, Trowse and Lakenham. Records indicate major flood events occurred in river systems in the Norwich area in 1770, 1784, 1878, 1912, 1947, 1968,1993 , 2015, 2018 and 2020. This suggests that there is less than a 30 year interval between major floods and this interval is decreasing . Planning applications often do not mention this. Even a 30 year interval would make many developments unsustainable and the applications should be refused. Climate change is likely to increase the frequency of such flood events.

Unfortunately the Environment Agency flood map for three major flood events, only shows the extent of the floods in selected areas. Surely with modern mapping techniques almost all historic flood events such as the 1912 event can be mapped and made available to towns and parishes. This would give everyone an idea of the potential extent of flood areas. The groundwater susceptibility maps for the Norwich area is interesting because it indicates potential extent for flooding.

It would be informative if planners published information on the number and location of flooded properties in their area in the last 50 years and the dates when these properties were built.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

24322

Object

**The Road Network, 83****Respondent:** Mr graham martin [19999]**Summary:****3.c Norwich Western Link**

For a year I worked for Bernard Matthews mainly at Weston Longville and have a fair appreciation of the area of the proposed NWL

If a Norwich Western Link ( NWL) is thought necessary it is not clear to many people why Option C was chosen by Norfolk County Councillors when a much cheaper and less environmentally damaging Option B(West) route is available.

1.Option B(west) and Option C both join the A47 at the same point, Wood Lane near Honingham. The economic benefits seem almost identical.

2. Option C involves a 720-metre-long viaduct over the Wensum and would cost £153 Million.

Option B(West) could utilise the existing bridge and needs no new crossing of the Wensum, no viaduct and costs £129 Million.

3. Environmental issues relating to NWL are extremely important.

Option C would destroy parts of important County Wildlife Sites (CWS) and permanently sever connections between other habitats along the route.

Option B(West) skirts past almost all CWS and important habitats and was identified by the Environment Agency as the least environmentally damaging route and would provide a bypass for Weston Longville

4. Another option that might be considered in view of controversy about an NWL is a single carriageway route for Option B(West) would have less environmental impact and at a cost of about £43 Million, the cheapest option of all.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

24068

Object

**Wymondham, 4.64****Respondent:** R Mason [20045]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham (site GNLP0355).

It is of note that the GNLP does not propose any settlement boundary changes to accommodate suitable small site proposals of less than 0.5 hectares and there is no plan to undertake a focussed a review of settlement boundaries in the future. As set out in the following sections, land at Rightup Lane (GNLP0355) is effectively an infill site bound by the A11 and existing/proposed development already provided for within the adopted Wymondham Area Action Plan (WAAP).

Whilst a review of the settlement boundary would arguably be the most sensible way to deal with GNLP0355, which was only excluded from the WAAP due to a combination of not having been promoted as part of the WAAP and being within a different land ownership to the wider WAAP, the absence of such a review means that the only mechanism to address this anomaly is for it to be allocated within the GNLP. As such, the following representations are focussed upon the site selection process.

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham site GNLP0355.

Recommendation: Given the evident sustainability credentials of Land at Rightup Lane, Wymondham and the absence of any justification for not allocating this site, it should be allocated within the GNLP.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Illustrative Site Layouts - <https://oc2connect.gnlp.org.uk/a/48q>  
Full Rep - <https://oc2connect.gnlp.org.uk/a/49r>

24069

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** R Mason [20045]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham (site GNLP0355).

Policy 3 requires that every development will provide at least a 10% gain to biodiversity. Whilst this objective is generally supported, this will clearly place a cost on schemes which has not been considered within the Viability Assessment as required by the PPG (23b-005) and therefore has the potential to prejudice delivery. It will also have a potential land-take implication which could result in reduced delivery of new homes and employment space.

There is potential that this requirement could undermine the deliverability of elements of the GNLP especially given that some development typologies are already identified as being not viable or having marginal viability in Part 5 of the Viability Assessment even without this requirement.

Therefore, this policy requirement may render parts of the GNLP ineffective and is not consistent with national guidance.

**Change suggested by respondent:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham (Site GNLP0355)

**Recommendation:** It will be necessary to examine the implications of this requirement in an updated Viability Assessment and if necessary revise the GNLP accordingly prior to submission.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Illustrative Site Layouts - <https://oc2connect.gnlp.org.uk/a/48q>  
Full Rep - <https://oc2connect.gnlp.org.uk/a/49r>

24070

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** R Mason [20045]

**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

**Petition:** 2 petitioners

### Summary:

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham.

### Change suggested by respondent:

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Illustrative Site Layouts - <https://oc2connect.gnlp.org.uk/a/48q>  
Full Rep - <https://oc2connect.gnlp.org.uk/a/49r>

24071

Object

## Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** R Mason [20045]

**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

**Petition:** 2 petitioners

### Summary:

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham (site GNLP0355).

### Change suggested by respondent:

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham (site GNLP0355)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Illustrative Site Layouts - <https://oc2connect.gnlp.org.uk/a/48q>  
Full Rep - <https://oc2connect.gnlp.org.uk/a/49r>

24072

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** R Mason [20045]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 5 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham.

**Change suggested by respondent:**

Please see the section addressing Policy 5 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Illustrative Site Layouts - <https://oc2connect.gnlp.org.uk/a/48q>

Full Rep - <https://oc2connect.gnlp.org.uk/a/49r>

24073

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** R Mason [20045]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham.

**Change suggested by respondent:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham

**Recommendation:** Policy 7.6 should be deleted from the GNLP.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Illustrative Site Layouts - <https://oc2connect.gnlp.org.uk/a/48q>

Full Rep - <https://oc2connect.gnlp.org.uk/a/49r>



24243

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Mrs Lisa Meecham [19990]**Summary:**

Object local planning not safe

**Change suggested by respondent:**

-

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** None

23299

Object

**Policy 0605, 6.38****Respondent:** Mr Timothy Metford-sewell [19817]**Summary:**Traffic flow is already heavy on stringers lane/Aubrey rix close  
For a cul-de-sac.

The lack of raised pathways makes it unsafe for pedestrians a lot of children walk to the school and pathway/roadway is used heavily by pedestrians now let alone when you plan to start building

The green would end up being used to park heavy machinery and in turn would destroy it. The green is used a lot by the children of this small estate

**Change suggested by respondent:**

No entrance via stringers Lane

Better access can be had via Twyford lane and the development can repair the road at the same time

**Legally compliant:** Yes**Sound:** No**Comply with duty:** Yes**Appear exam:** Appearance at the examination**Attachments:** None

23859

Support

## How the GNLP fits in with other Planning bodies and strategies, 18

**Respondent:** Mid Suffolk District Council (Mr Robert Hobbs, Corporate Manager - Strategic Planning) [19541]

### Summary:

Mid Suffolk District Council supports the Greater Norwich Local Plan as published and the overall plan-making process for the GNLP has enabled effective engagement for Mid Suffolk District Council.

### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24183

Object

## Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** Halsbury Homes Ltd (Mr James Millard) [20029]

**Agent:** Pegasus Group (Mr Robert Barber) [19984]

**Petition:** 2 petitioners

### Summary:

Policy 1 outlines the broad strategic approach for the plan period, which includes the proposed housing requirement and housing commitments.

#### Housing requirement

Paragraph 65 of the NPPF requires that a housing requirement is established within a Local Plan, which shows the extent to which their identified housing need can be met over the plan period.

The foreword to the Draft Local Plan identifies a "requirement" for about 49,500 homes over the period 2018-38.

Paragraph 177 and Table 6 of the GNLP however identify a housing "target" for only 40,541 homes and Policy 1 identifies a "need" for around 40,550 homes.

The GNLP is therefore not only ambiguous such that it may not be effective, it also does not accord with national policy and therefore would benefit from a set housing requirement in strategic policies.

**Recommended modification:** to provide consistent references throughout the Local Plan to the 'housing requirement' as per Paragraph 65 of the NPPF.

#### The minimum housing need

The need for 40,541 homes is identified as having been calculated using the standard method. The standard method provides the minimum local housing need 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<sup>1</sup>. 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 8.92 respectively. Using these figures, the minimum local housing need over the plan period equates to 41,388 homes.

Alternatively, the minimum local housing need from 2020 onwards can be calculated using the average household growth over the 10 consecutive years from 2020, namely 2020-30, with

1 As confirmed in paragraph 15 of the Housing Delivery Test Measurement Rule Book.

the affordability ratios of 2019 applied. The average household growth was 394, 505 and 680 respectively and the median workplace-based house price to earnings ratios were 9.01, 6.97 and 9.02 respectively. These figures produce a minimum local housing need of 2,008 homes per annum which equates to 36,148 homes over the period 2020-38. Table 6 of the GNLP identifies that 5,240 homes were completed in 2018-20. In addition to the minimum local housing need of 36,148 over the period 2020-38 this would again produce a minimum local housing need for 41,388 homes over the plan period.

It is therefore apparent that the standard method has been miscalculated within the GNLP and that the minimum local housing need is greater at 41,388 homes.

#### Historic under-delivery

In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 25,878 housing completions in the period 2008-20. However, only 20,924 homes have been delivered which demonstrates that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa 23.7%. The overestimations of supply can be mainly attributed to the delivery rates of strategic infrastructure projects, and consequently, the ability of large scale SUE's to be delivered across Greater Norwich. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement which is 25% in excess of the minimum need for 40,541 homes. This would produce a housing requirement for 50,676 homes. Our client welcomes the Council's decision to include a substantial buffer of over 20% between its housing requirement and housing supply. This is essential to ensure the plan has sufficient flexibility to meet needs in full across the plan period.

#### Change suggested by respondent:

Recommended modification: In combination with the subsequent considerations, it will therefore be necessary to modify the emerging housing.

#### Historic under-delivery

Recommended modification: It is, therefore, recommended that a proposed minimum contingency of 25% is retained as a minimum.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Norton Rd, Loddon - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4bt>

GNLP - Reg 19 Reps - Norton Road, Loddon - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b3>

24184

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Halsbury Homes Ltd (Mr James Millard) [20029]**Agent:** Pegasus Group (Mr Robert Barber) [19984]**Petition:** 2 petitioners**Summary:**

POLICY 5 – HOMES

Policy 5 of the GNLP Draft Strategy sets out a requirement of 33% affordable housing on sites of 10 or more units, even though the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) identifies that there was a need for 39,486 homes, of which 11,030 represents 28% affordable housing. The affordable requirement should be based on up to date evidence and should be subject to detailed viability testing at a range of scenarios. Therefore, this aspect of Policy 5 will need to be amended.

**Change suggested by respondent:**

Recommendation: In order to address this, it will be necessary to either recalculate the affordable housing needs based on the planned supply and then set affordable housing policies accordingly, or to reduce the affordable housing requirement within Policy 5 to 28%.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Norton Rd, Loddon - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4bt>

GNLP - Reg 19 Reqs - Norton Road, Loddon - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b3>

24185

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Halsbury Homes Ltd (Mr James Millard) [20029]**Agent:** Pegasus Group (Mr Robert Barber) [19984]**Petition:** 2 petitioners**Summary:**

POLICY 7.3 – KEY SERVICE CENTRES

Paragraph 372 of the GNLP outlines that Key Service Centres have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving rural areas. It also identifies that these roles are intended to continue supported by appropriate levels of development.

The Draft GNLP Strategy states that the Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham, will deliver 3,679 homes over the plan period (approximately 7% of the proposed housing growth).

Loddon has one new proposed housing allocation in the Draft GNLP Strategy, which is to the south-east of the settlement (Policy GNLP0312, Land to the east of Beccles Road) for the development of over 180 homes. Land to the north and south of Norton Road would adjoin onto the northwestern boundary of 'Land to the east of Beccles Road' (GNLP0312) and lead to the natural extension of the sustainable settlement of Loddon. The GNLP Loddon and Chedgrave Site

Assessment Booklet assesses submitted sites in these settlements for consideration in the GNLP. It states that our client's site is "well related to services, is adjacent to a site which has been preferred for housing allocation, and offers the potential to increase permeability within this part of the town." As a result, the site was shortlisted for further assessment (Stage 6). The Stage 6 Assessment centred on the impacts on highways, flood risk, landscape visual and local services, as further set out in the paragraphs below.

#### Highways Impact

The initial Highways Authority comments from the Booklet state that Norton Road is not suitable for development traffic, but the southern section of the site may be accessed via the adjacent allocation Land to the east of Beccles (GNLP0312). As outlined with our client's Regulation 18 representations, they agree that suitable accesses can not only be achieved via the neighbouring allocation but also onto Norton Road.

Since the submission of Regulatory 18 representations, our client has commissioned technical transport assessments to evaluate the feasibility of creating two T-junctions on either side of Norton road, to serve both the site's northern and southern sections. At present, a through route via Land to the east of Beccles is not possible as this is a draft allocation (GNLP0312) and does not benefit from an extant consent. Therefore, the Transport Assessment (TA) solely assessed the highway's impact on two proposed Norton Road accesses. The Transport

Assessment recommended that a new footway is included on both sides of Norton Road and an extension of the existing 30mph towards the east. The TA concluded that such a proposal should be considered acceptable on transport-related grounds. Therefore, contrary to the initial Highways Authority comments, this detailed TA has found that it could be feasible to create safe vehicular access onto Norton Road.

#### Landscape Visual impact

Comments from Development Management raise concerns that the site would "cause harm to the landscape and the rural setting of the Broads." However, no further details are provided. A Landscape and Visual Impact Assessment (LVIA) instructed by our client, states that the views of the Site are considered to be well contained and highly localised within the context of the existing visual environment. The assessment concludes that the Site and receiving environment have the capacity to accommodate a strategic residential scheme. The allocation will not result in significant harm to the landscape character or visual environment and, as such, it is considered that a strategic housing proposal can be successfully integrated in this location.

#### Flood Risk impact

In terms of the other comments raised in the Loddon and Chedgrave Site Assessment Booklet, the Lead Local Flood Authority (LLFA) outlines that a complete geotechnical investigation will be needed to determine infiltration potential. Nevertheless, the LLFA outlines that "the site is at risk of surface water flooding, but this is not severe enough to prevent development of the site" and mitigation could be provided at the required planning stage." This is further supported in a Flood Risk Assessment (FRA) prepared by our client. The FRA concludes that with appropriate mitigation measures, the risk of flooding from all sources is generally low, and a development proposal can be operated safely and without significantly increasing flood risk elsewhere.

#### Sustainability

Land to the north and south of Norton Road is considered to be located in a sustainable location as it is easily accessible to Loddon's 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.

However, the Loddon and Chedgrave Site Assessment Booklet states that if this site was allocated in addition to the two other allocations in Loddon & Chedgrave, "development of this site may overwhelm public services." However, as previously stated in our clients' Regulatory 18 Representations, there is the potential to deliver new community facilities at Land off Norton Road, Loddon, for a range of uses, including public open space. Halsbury Homes Ltd will explore whether it may be possible to deliver additional facilities at the site. There is also the potential for off-site contributions to upgrade existing facilities. Halsbury Homes would welcome the opportunity to engage with the local community to understand what kind of facility will achieve the greatest benefit to the community.

#### Other Issues

Other technical reports commissioned by our client found there would be no adverse effects (subject to suitable mitigations) on nearby heritage assets, air quality, amenity and noise and trees.

#### Conclusion

The Loddon and Chedgrave Site Assessment Booklet concludes that the site is considered unsuitable for allocation. However, our client considers that the Councils should consider identifying additional available and deliverable small and medium sized sites from a range of locations capable of accommodating housing growth within the plan period. The site is available and deliverable within the plan period, with site access feasible to both the northern and southern sections of the site. The absence of additional allocations at Loddon is therefore not justified. The resultant disproportionately low level of growth will compromise the vitality of the settlement contrary to paragraph 78 of the NPPF

#### Change suggested by respondent:

Recommendation: In order to provide greater certainty for the plan period, it will be necessary to increase the amount of housing in Key Service Centres, such as Loddon, which is capable of accommodating housing growth within the plan period. This provides the opportunity to allocate Land to the North and South of Norton Road, Loddon.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Norton Rd, Loddon - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4bt>

GNLP - Reg 19 Reprs - Norton Road, Loddon - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b3>

## 24554

## Object

### Site Assessment Booklets and Studies, Key Service Centres Assessment Booklets

**Respondent:** Halsbury Homes Ltd (Mr James Millard) [20029]

**Agent:** Pegasus Group (Mr Robert Barber) [19984]

**Petition:** 2 petitioners

#### Summary:

POLICY 7.3 – KEY SERVICE CENTRES

Paragraph 372 of the GNLP outlines that Key Service Centres have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving rural areas. It also identifies that these roles are intended to continue supported by appropriate levels of development.

The Draft GNL Strategy states that the Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham, will deliver 3,679 homes over the plan period (approximately 7% of the proposed housing growth).

Loddon has one new proposed housing allocation in the Draft GNL Strategy, which is to the south-east of the settlement (Policy GNL0312, Land to the east of Beccles Road) for the development of over 180 homes. Land to the north and south of Norton Road would adjoin onto the northwestern boundary of 'Land to the east of Beccles Road' (GNLP0312) and lead to the natural extension of the sustainable settlement of Loddon. The GNL Loddon and Chedgrave Site Assessment Booklet assesses submitted sites in these settlements for consideration in the GNL. It states that our client's site is "well related to services, is adjacent to a site which has been preferred for housing allocation, and offers the potential to increase permeability within this part of the town." As a result, the site was shortlisted for further assessment (Stage 6). The Stage 6 Assessment centred on the impacts on highways, flood risk, landscape visual and local services, as further set out in the paragraphs below.

#### Highways Impact

The initial Highways Authority comments from the Booklet state that Norton Road is not suitable for development traffic, but the southern section of the site may be accessed via the adjacent allocation Land to the east of Beccles (GNLP0312). As outlined with our client's Regulation 18 representations, they agree that suitable accesses can not only be achieved via the neighbouring allocation but also onto Norton Road.

Since the submission of Regulatory 18 representations, our client has commissioned technical transport assessments to evaluate the feasibility of creating two T-junctions on either side of Norton road, to serve both the site's northern and southern sections. At present, a through route via Land to the east of Beccles is not possible as this is a draft allocation (GNLP0312) and does not benefit from an extant consent. Therefore, the Transport Assessment (TA) solely assessed the highway's impact on two proposed Norton Road accesses. The Transport

Assessment recommended that a new footway is included on both sides of Norton Road and an extension of the existing 30mph towards the east. The TA concluded that such a proposal should be considered acceptable on transport-related grounds. Therefore, contrary to the initial Highways Authority comments, this detailed TA has found that it could be feasible to create safe vehicular access onto Norton Road.

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Comments from Development Management raise concerns that the site would "cause harm to the landscape and the rural setting of the Broads." However, no further details are provided. A Landscape and Visual Impact Assessment (LVIA) instructed by our client, states that the views of the Site are considered to be well contained and highly localised within the context of the existing visual environment. The assessment concludes that the Site and receiving environment have the capacity to accommodate a strategic residential scheme. The allocation will not result in significant harm to the landscape character or visual environment and, as such, it is considered that a strategic housing proposal can be successfully integrated in this location.

#### Flood Risk impact

In terms of the other comments raised in the Loddon and Chedgrave Site Assessment Booklet, the Lead Local Flood Authority (LLFA) outlines that a complete geotechnical investigation will be needed to determine infiltration potential. Nevertheless, the LLFA outlines that "the site is at risk of surface water flooding, but this is not severe enough to prevent development of the site" and mitigation could be provided at the required planning stage." This is further supported in a Flood Risk Assessment (FRA) prepared by our client. The FRA concludes that with appropriate mitigation measures, the risk of flooding from all sources is generally low, and a development proposal can be operated safely and without significantly increasing flood risk elsewhere.

## Sustainability

Land to the north and south of Norton Road is considered to be located in a sustainable location as it is easily accessible to Loddon's 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.

However, the Loddon and Chedgrave Site Assessment Booklet states that if this site was allocated in addition to the two other allocations in Loddon & Chedgrave, "development of this site may overwhelm public services." However, as previously stated in our clients' Regulatory 18 Representations, there is the potential to deliver new community facilities at Land off Norton Road, Loddon, for a range of uses, including public open space. Halsbury Homes Ltd will explore whether it may be possible to deliver additional facilities at the site. There is also the potential for off-site contributions to upgrade existing facilities. Halsbury Homes would welcome the opportunity to engage with the local community to understand what kind of facility will achieve the greatest benefit to the community.

## Other Issues

Other technical reports commissioned by our client found there would be no adverse effects (subject to suitable mitigations) on nearby heritage assets, air quality, amenity and noise and trees.

## Conclusion

The Loddon and Chedgrave Site Assessment Booklet concludes that the site is considered unsuitable for allocation. However, our client considers that the Councils should consider identifying additional available and deliverable small and medium sized sites from a range of locations capable of accommodating housing growth within the plan period. The site is available and deliverable within the plan period, with site access feasible to both the northern and southern sections of the site. The absence of additional allocations at Loddon is therefore not justified. The resultant disproportionately low level of growth will compromise the vitality of the settlement contrary to paragraph 78 of the NPPF

## Change suggested by respondent:

Recommendation: In order to provide greater certainty for the plan period, it will be necessary to increase the amount of housing in Key Service Centres, such as Loddon, which is capable of accommodating housing growth within the plan period. This provides the opportunity to allocate Land to the North and South of Norton Road, Loddon.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Norton Rd, Loddon - Location Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4bt>

GNLP - Reg 19 Reps - Norton Road, Loddon - 22.03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4b3>



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**23333****Object**

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**Intro, 1.3****Respondent:** MR Peter Milliken [13706]**Summary:**

How can this be a full coherent interlocking plan if a section is missing covering the area of South Norfolk.

**Change suggested by respondent:**

Withdrawn the Reg 19 plan and submit once all the information is at hand to review as a whole.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

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**23325****Object**

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**Easton and Honingham, 3.39****Respondent:** MR Peter Milliken [13706]**Summary:**

Honingham is not to the South of Easton, that is the village of Marlingford. The statement is misleading, the village has a number of amenities including a pub and restaurant and a number of business large and small operating from premises within the village. It has a substantial village hall and a 3 star hotel. It is not as made out in this statement.

**Change suggested by respondent:**

This section needs to be rewritten, with the correct information otherwise it gives a false impression of the village.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23328

Object

**Policy COS5/2074, COS5/2074 Policy****Respondent:** MR Peter Milliken [13706]**Summary:**

The extra facilities of looking to add retail and leisure will add greatly to the over stretched local road network. The village of Easton will face major traffic issues in the gradual creep of development on this site. Two pubs/ restaurants as well as a hotel and a retail park are within less than 5 minutes walking distance from the Showground. This also creates conflict with the Easton Neighbourhood Plan Policy 2.

**Change suggested by respondent:**

Removal of the adjusted wording from the original approval.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23326

Object

**Easton and Honingham, 3.40****Respondent:** MR Peter Milliken [13706]**Summary:**

The original housing numbers are not deliverable due to about 90 of these houses are allocated on land that is deemed contaminated by the department for environment food and rural affairs. They are also looking to mislead the inspector as to the deliverability 90 homes on an unallocated section of EAS1 next to the Easton Gym club on Bawburgh Road. Currently a planning application under South Norfolk 2021/0132 and is to be determined by Norfolk County Council FUL/2020/0110.

**Change suggested by respondent:**

The removal of the extra housing allocation to the East of the Easton Gym. The separation of Easton and Honingham as two separate villages and full consideration of the Easton Neighbourhood Plan Policy 2 needs to be considered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23453

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Chet Valley B-Line (Mr Andrew Milner) [19869]

**Summary:**

General: we are unable to tell from the Green Infrastructure Corridors maps if these include all the Norfolk B-Lines, including the Chet Valley B-Line. The National B-Line launch takes place 23/03/2021, but the routes in Norfolk are already well known.

GNLP "Tools such as the Defra biodiversity metric should be used to demonstrate the expected biodiversity net gain that will be achieved through development."

GNLP "It will need to be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) on the existing situation."

Concern: SMART targets need to be applied to BNG. They should be Specific, Measurable, Attainable, Relevant and Time Specific.

Concern: unless all LAs use the same tool no consistent measurement will be possible. Similarly, LAs should follow the same assessment and monitoring procedures, practices, and principles to ensure consistency. We recommend the CIRIA Good Practice Principles for Development: a practical guide. We also understand that a new British Standard BS8683 is being developed.

Concern: all LAs need access to specialist ecological advice and to be able to identify sites of ecological value that may have no formal designation e.g., brownfield. Within the B-Line corridors we recommend surveys are conducted using Buglife's Good Planning Practice for Invertebrates: Surveys.

Concern: Developers should be penalised if they reduce the sites biodiversity value before submitting applications.

Habitat removal prior to application submission can seriously reduce biodiversity value and should be strictly discouraged by measuring value prior to removal.

Concern: The BNG 10% gain should be time specific and prior to the developer relinquishing responsibility for the site.

**Change suggested by respondent:**

General: we are unable to tell from the Green Infrastructure Corridors maps if these include all the Norfolk B-Lines, including the Chet Valley B-Line. The National B-Line launch takes place 23/03/2021, but the routes in Norfolk are already well known.

GNLP "Tools such as the Defra biodiversity metric should be used to demonstrate the expected biodiversity net gain that will be achieved through development."

GNLP "It will need to be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) on the existing situation."

Concern: SMART targets need to be applied to BNG. They should be Specific, Measurable, Attainable, Relevant and Time Specific.

Concern: unless all LAs use the same tool no consistent measurement will be possible. Similarly, LAs should follow the same assessment and monitoring procedures, practices, and principles to ensure consistency. We recommend the CIRIA Good Practice Principles for Development: a practical guide. We also understand that a new British Standard BS8683 is being developed.

Concern: all LAs need access to specialist ecological advice and to be able to identify sites of ecological value that may have no formal designation e.g., brownfield. Within the B-Line corridors we recommend surveys are conducted using Buglife's Good Planning Practice for Invertebrates: Surveys.

Concern: Developers should be penalised if they reduce the sites biodiversity value before submitting applications.

Habitat removal prior to application submission can seriously reduce biodiversity value and should be strictly discouraged by measuring value prior to removal.

Concern: The BNG 10% gain should be time specific and prior to the developer relinquishing responsibility for the site.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23920

Object

**Aylsham, Settlement Map****Respondent:** Mrs Ann Minett [19890]**Summary:**

I would like to protest that the proposals for Aylsham are not legally compliant or sound at the reg. 19 stage. I attended the public consultation held in the Town Hall for Aylsham, and there was no indication that two sites would be put forward. I understood one site was possible. The development of two sites would have a massive impact on schools, medical services, water and sewage provision etc and I feel this impact has not been considered properly and the proposals Anne therefore not sound.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23562

Object

**Foulsham and Themelthorpe, 6.35****Respondent:** Ms Claire Morgan [19121]**Summary:**

I do NOT think this has been thought through properly. Foulsham is already congested through the High Street and the access to the proposed site, already constricted.

**Change suggested by respondent:**

This plan should be scrapped. Foulsham is already congested through the High Street and the access to the proposed site, already constricted.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23564

Object

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**Foulsham and Themelthorpe, 6.36****Respondent:** Ms Claire Morgan [19121]**Summary:**

This plan has NOT been properly thought through as to the impact it will have on existing residents. The High Street is already congested and, the proposed entry to the site constricted already.

**Change suggested by respondent:**

The plan needs to be scrapped. Existing residents are already hampered through the High Street due to congestion. The proposed entry to the site is already effectively a single track road due to constricted width and parked vehicles.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23565

Object

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**Foulsham and Themelthorpe, 6.37****Respondent:** Ms Claire Morgan [19121]**Summary:**

Parts of Foulsham are already designated as flood plain and therefore unable to be built on. Having even more properties and non permeable roadways and hard-standings will undoubtedly put undue strain on our environment and displacement of wildlife. I object to this proposal.

**Change suggested by respondent:**

This plan needs to be scrapped. I object to this proposal.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23567

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Ms Claire Morgan [19121]**Summary:**

Residents impacted already, being constricted through the High Street and through the propose site entrance, will be even MORE impeded due to the extra traffic brought about by this proposal. Both roads being; in effect, already single track. It is unthinkable to countenance even more vehicles of a residential and commercial nature clogging the traffic flow. It is also a safety hazard as vehicles do not adhere to the 20mph speed limit now. The environmental impact due to extra fumes, hard surfaces, buildings, displacement of wildlife, water issues, ie. flooding, contamination etc. have also not been sufficiently taken into account.

**Change suggested by respondent:**

This plan needs to be scrapped. I object to this proposal.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23922

Object

**Aylsham, Settlement Map****Respondent:** Julie and Michael Mowbray [19970]**Petition:** 2 petitioners**Summary:**

We were horrified to find out that there are even more large estates to be built in our little market town of Aylsham. We do not want to grow into a suburb of Norwich. We understand there was no consultation with the town council or the residents of Aylsham. This cannot be legal. If this is how you treat people we will not be voting Conservative in the May election.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24063

Object

**Lingwood, Settlement Map 1****Respondent:** Munnings Construction Limited (Mr Phil Munnings, Director) [19778]**Petition:** 2 petitioners**Summary:**

We consider the plan to be unsound as the reason for rejection refers to;

“Access to the village would be along a relatively busy road with no footways so therefore there is no safe walking route to Lingwood Primary school”.

The adjacent site GNLP0067 has planning permission granted under appeal decision APP/K2610/W/16/3145283. Pre-commencement condition 14 states;

“Notwithstanding the details indicated on the submitted drawings, no works shall commence on site until a detailed scheme for the off-site highway improvement works and access as indicated on drawings numbered 566/03/003 Rev B and 566/03/004 has been submitted to and approved in writing by the local authority.

Condition 15 states;

“No part of the development shall be occupied until the off-site highway Improvement and access works referred to in condition 14 above have been implemented in accordance with the approved details”.

The off-site highway improvement works referred to consist of the provision of a new pedestrian footway linking the development to the village. The adjoining site GNLP0067 shall be developed before site GNLP4051 as the site is otherwise landlocked. Therefore, the reason for rejection is unsound as there will be a footway in place joining the site GNLP4051 to the village and subsequently providing a safe walking route to Lingwood Primary School.

**Change suggested by respondent:**

We consider the local plan should be modified in the following way to make it sound;

The reason for rejection should be changed to remove reference to there being no safe walking route to Lingwood Primary School.

This can be incorporated into any future planning permission pre-commencement condition that should arise. This will ensure the highway improvement works are implemented to provide the safe walking route to Lingwood Primary School from the development.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23911

Support

**Introduction, Table 8 Key issues addressed by policy 2****Respondent:** National Grid (Matt Verlander, LP Contact) [13219]**Summary:**

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24463

Support

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

We welcome the recognition given under (5) of Policy 6 to protect, enhance and expand the Green Infrastructure network.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24474

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]



**Summary:**

We objected to the policy and supporting text in our response to the Reg 18 Consultation (see our letter dated 16 March 2020 (our ref:307463)). We consider that the policy and supporting text are inadequate to protect, maintain, restore and enhance the natural environmental assets of the area. The policy will not ensure the delivery of Green Infrastructure of sufficient quality and quantity in the right locations (contrary to NPPF para 171), nor help the Plan to meet the sustainability criteria or adapt to climate change in a coherent and robust manner. It contains too much uncertainty and needs to explain the hierarchies of site protection and mitigation.

As currently worded, Policy 3:

- does not make it clear that there is a hierarchy of avoiding, mitigating and then compensating significant harm (NPPF para 171);
  - does not contain criteria against which any proposed development affecting designated sites will be judged (NPPF para 175);
  - does not make clear the distinctions between the hierarchy of designated sites and landscapes so that protection is commensurate with their status and gives appropriate weight to their importance (NPPF para 175 and para 172);
  - does not make clear that the sustainable development presumption does not apply where development requiring appropriate assessment is required (NPPF para 177); and
- does not make explicit reference to either project level Habitats Regulations Assessments (HRAs), or potential compensatory measures, as being required in relation to those allocations which have likely significant effects on European habitats sites.

Previously we recommended using Policy 1: Addressing climate change and protecting environmental assets in the current Joint Core Strategy (2011) as a basis, since much of this policy is valid under the NPPF and relevant, and suggested looking at East Suffolk Council's 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>). Their Local Plan was adopted subsequently in September 2020 with only some minor amendments made to Policy SCLP 10.1.

**Change suggested by respondent:**

We strongly recommend that Policy 3 and the supporting text are substantially amended and expanded to address the points made in (5) above, together with more comprehensive details and measures including in relation to designated sites and protected landscapes, protected species, climate change adaptation, halting and reversing the loss of biodiversity, recreational disturbance on non-designated sites, Green Infrastructure (GI) networks and suitable alternative greenspace (SANGS).

Despite providing only an elementary level of information, many other Policies repeatedly refer to Maps 8A and 8B, stating that:

"Enhancements to the multi-functional green infrastructure network will be provided by development to contribute to the strategic network as set out in maps 8A and B and to linking local networks."

The Local Plan needs to provide a comprehensive strategic document, rather than Maps 8A and 8B, that sets out how the development proposals in the Plan will contribute to creating new GI, and protecting, expanding or enhancing existing GI, at site level, and across the Plan area, to form a cohesive GI network that delivers multiple benefits for people and the natural environment.

New development should provide environmental net gains in terms of both GI and biodiversity. Proposals should demonstrate how the development would contribute towards new GI opportunities or enhance the existing GI network as part of the development. New development must also secure ecological enhancements as part of its design and implementation, and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal, and contribute to establishing coherent ecological networks that are more resilient.

To ensure that the policy is compliant with both the NPPF and the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations') we recommend that the following text is added to Policy 3:

"Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the project will have to be refused or pass the tests of regulation 62, in which case any necessary compensatory measures will need to be secured."

This amendment is also necessary due to the way in which mitigation measures for various designated sites (identified in the Plan's Habitats Regulations Assessment), have been incorporated into the wording of the relevant policies in the Plan.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

24464

Support

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]

**Summary:**

Under the East Norwich heading in the policy, we welcome the reference to protecting and enhancing green infrastructure (GI) assets, corridors and open spaces within the area. We also support the references to the delivery of GI under the section headed Elsewhere in the urban area including the fringe parishes.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24465

Support

### Policy 7.2 The Main Towns, Policy 7.2 The Main Towns

**Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]

**Summary:**

We welcome the reference to enhancing existing green infrastructure (GI) in the supporting text and in the final paragraph of the policy.

Instead of the basic maps 8A and 8B, if reference could be made to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.

**Change suggested by respondent:**

Instead of the basic maps 8A and 8B, if reference could be made in the policy to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24466

Support

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

We welcome the reference to enhancing existing green infrastructure (GI) in the supporting text and in the final paragraph of the policy.

Instead of the basic maps 8A and 8B, if reference could made to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.

**Change suggested by respondent:**

Instead of the basic maps 8A and 8B, if reference could made in the policy to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24467

Support

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

We welcome the reference to enhancing existing green infrastructure (GI) in the supporting text and in the final paragraph of the policy.

Instead of the basic maps 8A and 8B, if reference could made to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.

**Change suggested by respondent:**

Instead of the basic maps 8A and 8B, if reference could made in the policy to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24468

Object

**The Natural Environment, 109****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

'The natural environment' section needs to be improved and expanded as it currently is unclear or incomplete. It needs to recognise and include the issues that the natural environment, both within and adjoining the Plan area, is facing including biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed Plan may impact on and address these issues. Currently, it could be read as the only issues facing our natural environment are those identified under (109), which is clearly not the case.

In (109) the Plan needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but a wide range of other sites that are important for wildlife, including County Wildlife Sites (CWS) (locally protected sites).

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24469

Support

**The Natural Environment, 112****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

We welcome the amendments and additions, respectively, to (112) and (115) which help to recognise that the protection and delivery of quality GI is key to delivering many of its objectives and growth cannot be regarded as being sustainable without this.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24470

Support

**The Natural Environment, 115****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

We welcome the amendments and additions, respectively, to (112) and (115) which help to recognise that the protection and delivery of quality GI is key to delivering many of its objectives and growth cannot be regarded as being sustainable without this.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24471

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

The current wording of the policy needs to be strengthened with regard to the delivery of green infrastructure (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 (161).

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. It refers to other relevant Plan policies in relation to housing, the economy, areas of growth and other strategic infrastructure, so links to Policy 3 should be included too.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24472

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

The current policy states:

"Development must be high quality, contributing to delivering inclusive growth in mixed, resilient and sustainable communities, to enhancing the environment, and to mitigating and adapting to climate change, assisting in meeting national greenhouse gas emissions targets. To achieve this, development proposals are required, as appropriate, to:

3. Contribute to multi-functional green infrastructure links, including through landscaping, to make best use of site characteristics and integrate into the surroundings, having regard to relevant green infrastructure strategies and delivery plans; "

It is unclear what are the 'relevant green infrastructure strategies and delivery plans' and the policy should also 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.

**Change suggested by respondent:**

Please clarify in the text which strategy is being referred to.

We recommend that the wording of point (3) of the policy needs to be amended as follows (or a similar form of wording used):

"3. Contribute to multi-functional green infrastructure links, including through landscaping, to make best use of site characteristics and integrate into the surroundings, having regard to relevant green infrastructure strategies and delivery plans, and in line with Policy 3."

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24473

Object

**Introduction, Table 8 Key issues addressed by policy 2****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]

**Summary:**

Under Issue 3. Green Infrastructure (GI)- The text refers to:

"On-site provision will link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4, which has now been in development in Greater Norwich for over a decade in accordance with the Greater Norwich Green Infrastructure Strategy and delivery plans, and other documents such as the River Wensum Strategy.

In relation to Issue 3 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. GI provision is essential to divert and deflect the daily recreational visits away from the sensitive Habitats Sites, and their rare species, in order to avoid adverse effects on the integrity of these sites from all the individual developments alone.

It would be useful to state in (3) 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.

It is unclear if the above Green Infrastructure Strategy in (3) refers to The Greater Norwich Green Infrastructure Strategy (dated November 2007) or the Greater Norwich Green Infrastructure Study (produced in December 2020).

The Plan does not appear to have a clear overarching Green Infrastructure strategy, which (in light of all the proposed development) details how existing GI will be protected and enhanced, and new GI delivered. This is required to ensure a coherent GI network which contributes to the sustainable delivery of development.

**Change suggested by respondent:**

Please clarify in the text which strategy is being referred to.

We recommend that the wording of point (3) of the policy needs to be amended as follows (or a similar form of wording used):

"On-site provision will link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4, which has now been in development in Greater Norwich for over a decade in accordance with the Greater Norwich Green Infrastructure Strategy and delivery plans, and other documents such as the River Wensum Strategy. Where it is not possible to deliver quality GI on-site, which meets the needs of the inhabitants within, it is appropriate for individual developments alone, to deliver GI off-site nearby, or to financially contribute to the delivery of this, in order to avoid adverse effects on the integrity of sensitive Habitats sites."

It would be useful to add at the end of (3) 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."

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



24475

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

Neither Policy 4, nor the accompanying text (see below), provide any level of detail regarding the delivery of strategic Green Infrastructure (GI). Under para 112 GI has been identified as vital to supporting the delivery of development proposed in the Plan. In the NPPF, under 171, a strategic approach to maintaining and enhancing networks of habitats and green infrastructure should be taken.

para 224. We think this should reference the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR) rather than the Greater Norwich Local Plan Infrastructure Report (GNLPIR), which does not appear to exist. It states that this plan is supported by evidence contained in the GNLPINR, though in relation to Green Infrastructure (GI), the report only contains a map showing GI corridors, similar to Map 8A in the Plan.

para 226. GI is not mentioned once in the Appendix 1: Infrastructure Requirements referred to in this section, unlike all other forms of strategic infrastructure identified in the Plan.

The strategic and timely delivery of GI, both on-site and off-site, is essential to avoid or recreational impacts on sensitive habitats sites as identified in the Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy.

**Change suggested by respondent:**

To comply with the NPPF, para 171, we recommend that Policy 4 is modified to include a strategic approach to the delivery of GI, and make the Plan sound.

Under the heading Other Strategic Infrastructure, i(n Policy 4), we recommend that the wording of the policy needs to be amended as follows (or a similar form of wording used):

"Improvements to existing strategic green infrastructure and the creation of new green infrastructure will be delivered in line with policy 3 and other relevant plans and strategies including XXX

\*."

\* XX - the most relevant and current ones to be identified by the local authorities.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24514

Object

**The Vision for Greater Norwich in 2038, 125****Respondent:** Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]**Summary:**

For the Local Plan to deliver actual sustainable development and significantly address climate change, the vision needs to be better balanced. Otherwise, the vision as set out currently appears to be heavily focussed on growth at the expense of the other two pillars of sustainable development.

We suggested amended wording in our response, dated 16 March 2020 (our ref:307463) to the Reg 18 Consultation.

**Change suggested by respondent:**

We consider that under (125) the final sentence should be amended as follows:

'Growth will make the best of Greater Norwich's distinct built, natural and historic assets whilst protecting and enhancing them.'

We maintain that this wording is important to include as it sets the tone for the Local Plan and signals the commitment of the local authorities to safeguard their natural assets.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24292

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]**Summary:**

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation in particular sections 4.5.9 - 4.5.26, section 5.2, section 6.1 - Land at Norwich Common, Wymondham and section 6.2 - Land at Burston Road, Diss

**Policy 7.2 – The Main Towns**

4.5.9 Gladman on the whole is supportive of Policy 7.2 which distributes growth to the Main Towns of the Greater Norwich Area, recognising the need for these locations to accommodate growth and support the wider aims of the urban area.

4.5.10 The sustainability and suitability of both Diss and Wymondham as locations for further development is welcomed by Gladman. It is considered that the allocations made at both settlements through the Local Plan however is insufficient.

**Wymondham**

4.5.11 Wymondham is identified within the GNLP as a Main Town and has good transport links, including mainline rail services to Norwich, Cambridge and Stansted Airport. Wymondham is the main town serving the south-west of Greater Norwich and has potential to contribute to the development of the Cambridge Norwich Tech Corridor

. Wymondham is located at the heart of the A11 Cambridge to Norwich Tech corridor meaning that the town should play an important role in fulfilling this economic potential over the plan period with further employment and housing land required. Despite its location, the

GNLP only proposes to allocate 150 new homes to the Main Town of Wymondham.

4.5.12 The Regulation 18 Draft GNLP included the potential provision of a contingency site around Wymondham for the delivery of up to 1,000 dwellings. Gladman note that the regulation 19 GNLP has removed the reference to a potential contingency site around the edge of Wymondham without providing justification for its removal.

4.5.13 Given previous comments made above relating to the quantum of development proposed to come forward in and around the Norwich Urban Area, Gladman question the inclusion of a contingency site around Costessey as opposed to Wymondham. If the market is failing to deliver homes around the edge of Norwich, providing further land for residential development

in the same location will not solve the matter. Taking this into consideration Gladman propose that the inclusion of land around Wymondham, where much needed education capacity can be provided on site, should be included within the GNLP.

4.5.14 Taking into consideration the comments made above in relation to housing need and the case for flexibility in planned levels of supply, should committed and other sites fail to come to fruition, Gladman believe that not only should a contingency site around Wymondham be included, but that the site should be allocated. Allocating the land for housing provides

greatest certainty that site can come forward without delay, is available and deliverable for housing and reduces the need for a future review.

4.5.15 In this regard, Land off Norwich Common, Wymondham represents a logical extension to the settlement and should be further considered for allocation through the plan making process.

4.5.16 Gladman consider that strategic gaps should have been reviewed and revised through the plan making process of the GNLP. Since defined and last reviewed the context for each strategic gap is likely to have altered taking into account more recent development. Evidence

of this is clear in the case of the strategic gap between Wymondham and Hethersett. In recent years the character of the land at the north eastern edge of Wymondham along Norwich Common has significantly altered with new housing and employment development along the north of this road.

4.5.17 A thorough evidence-based assessment of all effected land parcels, together with wider related land has not been undertaken to consider whether strategic gaps remain a relevant and necessary designation to prevent the coalescence of settlements. As such, Gladman

contend that the inclusion of the 'rolling over' of the strategic gap policy without a review is not based upon up-to-date evidence and is therefore not sound.

Diss

4.5.18 Gladman is supportive of the identification of Diss as a Main Town within the settlement hierarchy. Diss has the widest range of shops and services of the main towns, as well as a broad range of employment opportunities. The town is located to the north west of the

junction of the A140 and A143 and benefits from rail connections to Norwich and London as well as acting as hub for local bus links. As such, the settlement forms a sustainable and logical location for further development.

4.5.19 Diss has a key role to play in supporting the surrounding villages and rural hinterland through its services and facilities. The retail offering of Diss is key in this supporting role with the large rural catchment extending in to parts of South Norfolk and northern Suffolk. As such, Diss demonstrates positive vitality and viability and has the opportunity to support further housing growth. There would be strong justification to provide further growth than is currently proposed in Diss due to this strong retail offering and other services, along with the good transport links to Norwich and beyond.

4.5.20 In progressing from the Regulation 18 consultation draft of January 2020 to the now submission version currently being consulted, matters have taken a backward step in Diss. The proposed strategy is now one which seeks to defer to the allocation of housing sites to the

emerging Diss and District neighbourhood plan. One proposed allocation for 150 dwellings remains, with the emerging neighbourhood plan to determine the location of the remaining 250 dwellings to be allocated to Diss. In combination with the existing commitment of just

over 300 dwellings, from the base date of the plan period, this takes the total housing target for Diss to just over 743 during the plan period.

4.5.21 For one of the main towns, the most significant settlement in the south of the plan area serving a wide rural hinterland with the largest retail offer outside of Norwich, this is an insufficient development quantum.

4.5.22 Reasons stated for limiting the level of growth towards Diss are attributed to environmental constraints and traffic constraints, based upon local evidence. Gladman are promoting land south of Burston Road (GNLP4049). Assessed following the close of the Regulation 18 consultation, the site is recognised as suitable for further consideration (Diss booklet of sites

evidence base paper). Based on the concept plan prepared to date we have sought to address 'amber' scoring issues, summarised as townscape and landscape considerations, to show that environmental impact is not an insurmountable constraint. Therefore, the issue in bringing this site forward is not an environmental one but instead highlighted as highways. It therefore follows that environmental concerns cannot be a reason for limiting growth in Diss.

4.5.23 Instead, the limiting factor is considered to be purely a highways constraint. Recognising this fact, it is therefore considered inappropriate to leave the decisions around the majority of housing allocations of Diss to the emerging neighbourhood plan. Seeking to resolve the

highways issue in Diss is considered to be a strategic matter best tackled during the local plan making process, not through the neighbourhood plan. We would welcome allocations being left to the community to decide if this was in addition to a suitable quantum of development steered towards Diss.

4.5.24 Paragraph 102 of the Framework is clear that transport issues should be considered from the earlier stages of plan-making so that potential impacts of development on transport networks can be addressed. Whilst issues have been identified it is considered that there is currently insufficient evidence to seek to limit the quantum of development directed towards to Diss

for these reasons. If this was such an insurmountable issue, referring site allocations to the neighbourhood plan, a mechanism inappropriate to tackle highways constraints is only likely to exacerbate the highways issue.

4.5.25 The Diss Network Improvement Strategy (April 2020) has identified a number of junctions requiring improvement and options for providing these improvements. It appears that little regard has been had for changing transport technology and usage over the plan period and how this could alleviate highways concerns. For example, as a longer-term impact of the

coronavirus pandemic commuting patterns may change allowing for further growth in one of the main towns where services and facilities are readily available, allowing development to be focussed in locations which are or can be made sustainable, as per Paragraph 103 of the Framework.

4.5.26 Instead, we are left to rely on a report which states that by 2036 the Morrison's junction would be over capacity with improvements needed. Doing nothing to address this is therefore not considered to be an option. Other options assessed, and ruled out, to address this can be summarised as either a northern link road or southern link road. These are considered to be extreme options which would cement commuting patterns rather than seeking to support a shift. Further testing should have been undertaken to determine a quantum of development that could be satisfactorily delivered without the need for new link roads. .. In this regard, further development than identified would be expected to contribute towards unlocking the necessary improvements identified.

## 5.2 MAIN TOWNS

5.2.1 Gladman supports the identification of Diss and Wymondham as Main Towns and submits that the sites we are actively promoting in these locations should be allocated to offer greater flexibility and to ensure that the housing need can be met over the plan period.

### Change suggested by respondent:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation in particular sections 4.5.9 - 4.5.26, section 5.2, section 6.1 - Land at Norwich Common, Wymondham and section 6.2 - Land at Burston Road, Diss

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

24290

Object

## Policy 2 Sustainable Communities, Policy 2 Sustainable Communities

**Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]

### Summary:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation.

#### Policy 2 – Sustainable Communities

4.3.1 This policy seeks to ensure that the design of development is of high quality, contributes to the establishment and maintenance of resilient and inclusive communities, promotes low carbon development and helps to address climate change. Table 8 sets out the key issues addressed by Policy 2, which include access to services and facilities, new technologies, green infrastructure, densities, local character, travel, inclusive and safe communities, resource efficiency and pollution, water and energy.

#### Densities

4.3.2 Gladman supports the principle of developments making effective use of land and that densities should be dependent upon on-site characteristics with higher densities in the most sustainable locations. The policy stipulates that indicative minimum net densities are 25

dwelling per hectare across the plan area and 40 in Norwich. Gladman submits that higher densities applied to the proposed allocations should be applied with caution unless specific evidence has been provided from the developer, landowner or promoter to support delivery.

If the higher densities are not achieved on the draft allocations, there is a risk to the delivery of the strategy within the GNLP.

### Change suggested by respondent:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation. See section 4.3 for comments regarding Policy 2

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

24546

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]**Summary:**

See attachment for full representation (section 4.4.14)

Policy 6 – The Economy (including Retail) Policy 6 sets out the strategy for delivering economic growth over the plan period in accordance with the New Anglia LEP's Norfolk and Suffolk Economic Strategy and Local Industrial Strategy, the Cambridge Norwich Tech Corridor initiative, and the enhanced growth outlined in the Greater Norwich City Deal. Gladman is supportive of the ambitious economic growth strategy, however the GNDB should recognise the role housing delivery has in supporting sustainable economic growth, particularly in supporting town centres. There is a need to ensure that the proposed level of allocations made through the GNLP maximises economic growth potential provided through the City Deal and the A11 Norwich to Cambridge Tech Corridor. It is both appropriate and sound to concentrate new development towards this broad strategic location. However, as advised in our previous representations, the implementation of this strategy should not come at the cost of maintaining the sustainability and important role played by settlements which fall outside this corridor. It is important that sufficient development is directed to these settlements to support their longer-term sustainability and functionality. Opportunities should also be taken to focus growth towards those settlements which are well served by public transport to support climate change objectives.

**Change suggested by respondent:**

See attachment for full representation (section 4.4.14)

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

24289

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]**Summary:**

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation.

Policy 1 – The Growth Strategy

4.2.1 As discussed in Section 3, the local housing needs assessment conducted using the Standard Method set out in national planning guidance forms only the minimum level of housing need for a local authority and does not establish a housing requirement figure.

4.2.2 Using the Government's standard methodology for identifying local housing need, based on the 2014 household projections, the GNLP's housing requirement for the period 2018-2038 is 40,541.

4.2.3 Nonetheless, the standard method does not account for changing economic circumstances, government policies or other issues that may affect demographic behaviour. In this instance, national planning policy does highlight circumstances whereby additional housing growth above the figure indicated by the standard method may be appropriate, including:

- “growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”

4.2.4 It is vital that the Plan considers economic growth when assessing the local housing need and considers if it is appropriate to set a higher housing requirement than indicated by the standard method to support economic growth ambitions

. Further to this, the Greater Norwich City Deal was signed with Government in December 2013 which aimed to create an additional 19,000 jobs and 3,000 homes. In order to support the enhanced growth potential, it is vital that the GNLP plans for a sufficient number of new homes.

4.2.5 Additionally, the Government has highlighted the long-term role the planning system and housebuilding has to play in the economic recovery from the COVID-19 pandemic, locally and nationally

. In this way, Gladman encourages the GNLP to fully consider the merits of planning for a housing figure beyond the minimum requirement of 2,027 dwellings per annum. For instance, an increased housing figure would enable the Greater Norwich authorities to capture a larger proportion of the £7 billion yearly housebuilder contributions<sup>10</sup>. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25<sup>11</sup>, it is also imperative that the GNLP identifies sufficient land to support the delivery of homes.

4.2.6 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation’s recommendation that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

4.2.7 Table 6 sets out the GNLP’s total housing potential between 2018 and 2038 which establishes that the GNLP has the potential to provide a buffer of 22% over its housing requirement. Gladman acknowledges and supports the GNLP in its provision of a 22% buffer above the local housing need figure but questions whether the buffer is sufficient after taking into consideration the additional housing needs of Norwich due to the signed City Deal. Any homes which are included in the figures to meet the need of the greater growth aspirations should not be included within the buffer. If the result of removing this additional need from the current 22% buffer resulted in a buffer of below 20%, then further sites should be allocated.

4.2.8 Gladman notes that 74% of the growth expected to come forward over the plan period to 2038 is from completions since the start of the plan period in 2018, permitted sites and existing allocations and commitments from the Site Allocations Plans, Area Action Plans for Wymondham, Long Stratton and the Growth Triangle and Neighbourhood Plans. Gladman acknowledges that a proportion of these sites already benefit from planning permission however raise concern over the deliverability of these sites.

4.2.9 Gladman has specific concerns that the levels of housing proposed will not be delivered on these existing allocations, many of which have been allocated for over five years and have not come forward to date. Gladman questions whether any further analysis or evidence has been provided to understand why these sites have not delivered and to demonstrate clearly that these sites will realistically be delivered within the plan period to 2038.

4.2.10 In order to achieve the figure of 31,452 dwellings coming from existing commitments, the GNLP is reliant upon an uplift of the housing density on the existing allocated sites. Gladman questions whether this approach is realistic or feasible. It appears to be an uncertain strategy to assume densities will increase on allocated sites and any uplift needs to be fully supported

by evidence that there is a realistic chance that the uplifted quantum of development is achievable on the site. It is important to consider the implications Covid-19 has had on the demand on certain types of properties. A recent Savills Survey<sup>12</sup> found that 39% of under 50s now want a bigger home with greater importance being put on more outdoor space. With this in mind, Gladman questions if it is realistic to assume that an uplift in the density of existing allocations can be achieved and suggests a more appropriate strategy would be to

allocate further sites to ensure that a sufficient buffer is available.

#### Settlement Hierarchy

4.2.11 Table 7 sets out Policy 1's settlement hierarchy. The hierarchy comprises four tiers to support a proportionate amount of growth according to the size and role of the settlement.

4.2.12 Gladman is supportive of the settlement hierarchy and particularly the identification of Diss and Wymondham as Main Towns. Table 7 shows that the growth in this tier of the hierarchy is 6,806 additional dwellings up to 2038. The amount of growth allocated to the Norwich Urban Fringe is 32,691 dwellings to 2038. Gladman submits that there is a risk to the delivery

of the sites identified on the Norwich Urban Fringe due to issues such as market saturation. Gladman also questions whether the uplift to the assumed densities on sites in this location are realistic and achievable.

4.2.13 Gladman submits that further growth should be allocated to the Main Towns to ensure the housing need figure is delivered and to allow for greater flexibility. Offering a wider variety of sites to the market in varied locations across the Greater Norwich area will provide greater certainty that the housing requirement will be met. Gladman's submissions in respect of the growth strategy are provided in more detail below under Policy 7 – Strategy for Areas of Growth.

#### Change suggested by respondent:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation.

See section 4.2 for comments regarding Policy 1

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

## 24291

## Object

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]

#### Summary:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation particularly sections 4.5.2 - 4.5.8 and section 5.1)

Policy 7.1 – The Norwich urban area including the fringe parishes

4.5.2 A total of 32,691 homes are to be delivered in Norwich and the surrounding parishes accounting for 66% of the overall growth for the GNLP area.

4.5.3 Gladman support the identification of Norwich as the most sustainable location for growth however they consider that there are deliverability concerns regarding the quantum of development which has been directed to Norwich. Out of a total commitment of 32,691 new homes at the Norwich Urban Area, 79%, or 26,019 homes are expected to be delivered on existing commitments and allocations.

4.5.4 Of particular note is the GNLP's over reliance on The Growth Triangle which is expected to deliver 13,507 homes within the plan period. Gladman question whether it is realistic to assume that this quantum of development could come forward within the plan period to 2038 due to concerns over market saturation and market interest from developers.

4.5.5 The East Norwich Strategic Regeneration Area was identified in the March 2020 Regulation 18 Draft GNLP as having an existing deliverable commitment of 780 dwellings and a total deliverable commitment of 2,000 dwellings following the allocation of a further 1,220



dwellings. The Regulation 19 GNLP establishes a total deliverable commitment of 4,000 homes for the East Norwich Strategic Regeneration Area. Gladman accept that the Deal Ground has increased in size however sufficient evidence must be supplied to demonstrate that the capacity for the area has the ability to increase by 2,000 dwellings.

4.5.6 Gladman support regeneration however realistic timeframes have to be considered when projecting completions from such sites. The supporting policy text in the Regulation 19 GNLP Greater Norwich Local Plan Gladman Representations Pre-Submission Regulation 19

states that further land is yet to be acquired. Given that land within the area is still to be acquired, in addition to the associated costs and remediation works associated with brownfield development, Gladman consider that there could be significant delays to delivery on this site.

4.5.7 As considered before, Covid-19 has changed home buyers' priorities with a recent Savills survey finding that 71% of younger buyers crave more outdoor space and rural locations. With this in mind Gladman would also question whether the demand exists for 4,000 dwellings in this location.

4.5.8 Taking this uncertainty over demand for urban dwellings into consideration, it seems logical that further allocations should be located at the Main Towns.

## NORWICH

5.1.1 Gladman supports Norwich being identified at the top of the settlement hierarchy as the most accessible and sustainable location in the area. The Pre-Submission Draft GNLP sets out the following housing figures for Norwich:

- Homes delivered in Norwich between 1st April 2018 to 31st March 2020: 1,885
- Unimplemented planning permissions and allocations in existing local plans: 5,254
- New allocations and uplift on existing allocations: 4,527
- Total: 11,666

5.1.2 Gladman notes that whilst a large number of sites contributing to the above benefit from planning permission, there are a number of sites allocated in previous local plans which have been brought forward into the GNLP. Gladman questions whether there is sufficient evidence to confirm that these sites will realistically be delivered within the plan period.

5.1.3 As previously mentioned there are risks to the delivery of a large number of dwellings in one market location such as market saturation and Gladman questions whether it is realistic to assume the total number of dwellings assumed will be delivered

5.1.4 Whilst Gladman supports regeneration there is also the question as to whether sites with medium to long term potential such as the East Norwich Strategic Regeneration Area, will deliver over the plan period. Additional infrastructure requirements, costs and remediation works associated with brownfield development need to be taken into consideration when making assumptions on delivery timescales.

### Change suggested by respondent:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation particularly sections 4.5.2 - 4.5.8 and section 5.1)

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

24293

Object

Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres

**Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]

**Summary:**

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation particularly sections 4.5.27 - 4.5.34, section 5.3 and section 6.3 - Land south of Burgate Lane, Poringland.

**Policy 7.3 The Key Service Centres****Poringland**

4.5.27 Poringland (including Framingham Earl) is identified in table 1 of the Regulation 19 consultation document as having the 6th largest population when compared to the 15 settlements in the Greater Norwich Area. Making it the second largest Key Service Centre after Hethersett, and larger than the Main Towns of Long Stratton and Harleston. This indicates the sustainability and popularity of Poringland within the Greater Norwich Area.

4.5.28 The Key Service Centres, of which Poringland is one, are described as having "a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas." Poringland does have a good range of services which include both a primary school and a secondary school, village hall, community hall, pharmacy, post

office, two doctors' surgeries, a dentist, O'Fynns Budgens Supermarket and numerous other shops and services. Norwich is also only approximately 6 miles (9.6km) from Poringland and is accessible via sustainable means of transport within 15 minutes.

4.5.29 As such, Poringland demonstrates positive vitality and viability and has the opportunity to support further housing growth. There would be strong justification to provide further growth in Poringland due to being host to a range of services and facilities, along with the good transport links to Norwich and beyond.

4.5.30 The 'Towards a Strategy' document identifies a requirement for 400-600 dwellings in Poringland. However, the proposed strategy for Poringland in the Greater Norwich Regulation 19 Plan does not allocate any further growth to Poringland. There are 536 dwellings with planning permission at the base date of the plan meaning that a substantial amount of land continues to be promoted for development in Poringland/Framingham Earl (including land in adjacent parishes of Bixley, Caistor St Edmund, Framingham Pigot, Framingham Earl, and Stoke Holy Cross). This high level of commitment suggests limiting further growth to Poringland going forward to this plan.

4.5.31 Aside from stating prior development commitments as a reason to limit growth, there are additional issues relating to the rural nature of large parts of the parishes, with the distinctive setting created by areas of heavily wooded former parkland. The 2012 South Norfolk Place

Making Guide suggests that development should not further accentuate the linear settlement pattern. The settlement has a history of surface water and ground water drainage difficulties, which will be a consideration for many sites in Poringland and Framingham Earl, and mitigation will be needed for any development on such sites. Amongst the constraints to further development is the need for a new additional primary school.

4.5.32 Gladman are concerned that currently no further growth is directed towards Poringland. As stated above the town provides a sustainable setting for future growth, in a place where people want to live. Deliverable sites should come forward in this location that could

contribute to local economic, social and environmental aspirations. Gladman believe the spatial strategy for housing growth needs to direct higher numbers to sustainable settlements within the 'Key Service Centres' tier, such as Poringland. This would 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. It also provides more certainty than the approach to allocate up to 1,200 homes within the "Village Cluster" on smaller sites in much smaller settlements which are not deemed as sustainable as settlements in the Key Services such as Poringland.

4.5.33 While it is accepted that Poringland has taken some growth, providing no new allocations is counterintuitive to the role Poringland plays in the District. As explained previously, Poringland is a sustainable settlement with sites readily available and deliverable now, that could provide extensive benefits to the community and help boost significantly the supply of housing as emphasised through national policy.

4.5.34 Gladman consider that allocating no new development through the Regulation 19 GNLP to a sustainable settlement such as Poringland will not provide the flexibility needed to ensure land supply is met over the

plan period. The level of new growth to be directed to the settlement should be substantially increased

### 5.3 KEY SERVICE CENTRES

5.3.1 Given previous comments made regarding the sustainability of Poringland and its connectivity to Norwich, Gladman submit that the level of growth directed to Poringland should be increased in order to provide the flexibility needed to ensure land supply is met over the plan period

#### Change suggested by respondent:

Please find attached the representations of Gladman in response to the Reg 19 Pre-submission Draft consultation particularly sections 4.5.27 - 4.5.34, section 5.3 and section 6.3 - Land south of Burgate Lane, Poringland.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

## 24545

## Object

### Policy 5 Homes, Policy 5 Homes

**Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]

#### Summary:

See attachment for full representation

#### Policy 5 – Homes

##### Affordable Housing

4.4.1 Policy 5 sets out that major residential development proposals of ten dwellings or more will provide at least 33% affordable housing on-site across the plan area except in Norwich City Centre where the requirement is at least 28%.

Gladman supports the principle of improving

affordability across Greater Norwich and the need to identify an appropriate affordable housing target for differing built environments that reflects the local circumstances.

4.4.2 Notwithstanding the above support, the Councils will need to be able to demonstrate through clear, robust, up-to-date viability assessment that the provision of affordable housing in line with the proposed policy is viable on the majority of schemes.

4.4.3 Gladman supports the element of flexibility within the draft policy allowing viability assessments to be submitted in respect of brownfield sites in particular circumstances. To confirm, the sites which are being promoted by Gladman for inclusion within the plan can all

provide a policy compliant level of affordable housing, if not greater for example Poringland offers 36% affordable housing.

##### Accessible and Specialist Housing

4.4.4 The policy states that development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported

on sites with good access to local services including on sites allocated for residential use.

4.4.5 Gladman is supportive of this policy approach as the provision of specialist housing to meet the needs of older people is of increasing importance.

4.4.6 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care).

Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide

internally accessible communal facilities including a residents' lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care manager's office and staff facilities.

#### Self/Custom Build

4.4.7 The policy states that with the exception of flats, at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots unless a lack of need can be demonstrated or plots have been marketed for 12 months and have not been sold.

4.4.8 Gladman objects to the inclusion of a fixed percentage requirement in relation to the provision of serviced self-build plots.

4.4.9 Whilst recognising the role attributed towards self-build in national planning policy as a source of housing land supply, we do not consider the inclusion of a requirement for all housing schemes over 40 dwellings to commit to onsite provision forms the most effective approach of responding to this source of housing need.

4.4.10 Gladman believes that those wishing to bring forward a self-build or custom build house are unlikely to wish to do this alongside a large-scale housing development. Consequently, rather than including a strict requirement for this provision Gladman would recommend the policy encourages the consideration of the provision of self-build plots in locations where the demand exists.

4.4.11 Gladman would prefer to see policy which seeks self-build plots being considered on an ad hoc basis as windfall rather than as a percentage requirement of larger development schemes. We consider this approach to be more in line with the wants and needs for the individuals seeking the plot and the developer's requirements for larger sites.

4.4.12 Should a percentage approach be taken forward, the requirement should be supported by clear and robust evidence of this source of housing need. Gladman recommends that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include selfbuild plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.

4.4.13 Gladman notes that the proposed policy does include a mechanism which allows developers the opportunity after 12 months to either continue to market the plots for self-build or to revert back to them being delivered as part of the wider market housing scheme. Gladman supports the inclusion of this policy mechanism as it is necessary to ensure that housing land is not unnecessarily prevented from being brought forward. This helps to provide flexibility and helps to ensure that the required housing is delivered. If there is genuine demand for selfbuild housing it is likely that these plots would be brought forward relatively quickly

#### Change suggested by respondent:

See attachment for full representation (Section 4.4)

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

24547

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]**Summary:**

Please see attachment for full representation particularly section 5.4

**5.4 COSTESSEY CONTINGENCY SITE**

5.4.1 Gladman notes the identification of a contingency site which will become an allocated site in the event the GNLP is not delivering housing at the anticipated rate. Gladman submits that the site we are promoting at Norwich Common, Wymondham would be a more suitable alternative for inclusion under this policy for the following reasons:

- The site is being actively promoted by Gladman, we have the experience and expertise to deliver a site of this scale.
- An outline planning application has been submitted by Gladman to South Norfolk Council and the technical information submitted with the application demonstrates that there are no constraints which would prohibit the development of the site.
- We are working with South Norfolk Council and have offered to provide additional land for education and other community uses as part of the development.
- The site can be suitably accessed using land entirely within our control.

**Change suggested by respondent:**

Please see attachment for full representation particularly section 5.4

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Gladman GNLP Reg 19 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cn>

24250

Support

**Policy 2163, 2163 Policy****Respondent:** Newall Properties Development [20057]**Agent:** Lanpro Services Ltd (Mr Philip Atkinson, Director) [12609]**Petition:** 2 petitioners**Summary:**

Further to the recent publication of the Regulation 19 version of the emerging Greater Norwich Local Plan, I can confirm that my client Newall Properties Development as owners of the Friars Quay Car Park (formerly Wilsons Glassworks) on Colegate in Norwich supports the emerging allocation for the site reference GNLP2163 entitled Friars Quay Car Park, Colegate as currently worded. My client contends that a minimum of 25 no. dwelling units as outlined in the emerging Policy can easily be achieved on the site and as advised previously this site is immediately available and deliverable to meet future housing needs in the City. My client further considers that the emerging Policy as currently worded accords fully with all relevant Government guidance and importantly the tests of soundness contained in paragraph 35 of the National Planning Policy Framework.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23909

Support

**Poringland, Settlement Map****Respondent:** G Newman [16792]**Summary:**

I endorse and fully support the Greater Norwich Planning Policy Team's decisions and reasoning for not including these sites for housing development listed under "Unreasonable Sites – Residential", namely:

- GNLP0391 A and B – Land at Framingham Earl, Burgate Lane (4.60 hectares)

"Neither of these sites are considered to be suitable for allocation. Roads serving both parts of GNLP0391 are narrow lanes considered unsuitable for serving additional development. Site B in particular would be intrusive into open countryside to the south-east of the settlement and would significantly adversely affect views of the landscape from the south. In addition, high amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland."

- GNLP2153 – Land South of Burgate Lane, Poringland (9.30 hectares)

"This site is not considered to be suitable for allocation as development would be intrusive into open countryside to the south-east of the settlement and would significantly adversely affect views of the landscape from the south. High amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland."

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23543

Object

**Policy COS5/2074, COS5/2074 Policy****Respondent:** Mr Mark Nicholas [19894]**Agent:** Mr Michael Haslam [15391]**Summary:**

The policy in the consultation document is now somewhat contradictory in that clause 2 restricts any new buildings to supporting the main functions of the Showground, but the paragraph under clause 5 opens the door to retail and leisure uses. To remove this apparent inconsistency we have re-drafted the policy by deleting clause 2 and replacing it with the words in the para below clause 5. The revisions have been shared with Phil Courtier who is comfortable with them. The revised wording is set out below.

**Change suggested by respondent:**

Planning applications for the use of the identified area for leisure, tourism, recreation, arts and exhibition uses will be considered positively provided that:

1. The open character of the site is retained, including the impact of ancillary uses such as car parking.
2. Small scale Food retail, including an anchor unit selling a significant proportion of locally produced goods; café/restaurant/public house uses; and other leisure and service uses, to serve the wider function of the showground will also be considered.
3. Harm would not be caused by the nature, scale, extent, frequency or timing of proposed activities, including:
  - a. any noise or vibration likely to be generated, including from motorised sports or flying; and,
  - b. any light which could have an impact beyond the site itself.
4. Highways and transport improvements are agreed with Norfolk County Council and, where appropriate, the Highways Agency, to be proportionate to the form and scale of development and includes pedestrian and cycle access across A47.
5. Wastewater infrastructure capacity must be confirmed prior to development taking place.

Supporting text:

3.22 Recognising that the Norfolk Showground has a need to support its role as a major visitor attraction and events location, and that it is located within and supports the Food Enterprise Zone, it is proposed to alter the existing showground policies to permit small scale food, dining and leisure-led development that also helps meet the needs of local residents who live in the immediate area.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



24272

Object

**Addressing Climate Change, 156****Respondent:** Ann Nix [19995]**Summary:**

1 Paragraph 156 states that local plans must set strategic polices which address climate change mitigation and adaptation.

What provisions will be made for infrastructure for electric cars?

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24273

Object

**Population, 38****Respondent:** Ann Nix [19995]**Summary:**

Paragraph 38. states that carbon emissions are above the national average in rural parts of the area, partly due to a greater reliance on car journeys. I see no mention in the plan of providing frequent low-carbon public transport links to the villages in the Plan area. Particularly there is a need throughout the area for bus services in the mid and late evenings so that residents in villages who work outside the normal 9 to 5 working day can commute and also so residents can access the cultural life, restaurants etc. offered by Norwich without being forced to use private cars or taxis to get home after 6 pm.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24274

Object

**Emissions and Climate Change, 97****Respondent:** Ann Nix [19995]**Summary:**

Paragraph 97 states that “policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate.” I see little evidence of this in the plan.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24275

Object

**The Natural Environment, 210****Respondent:** Ann Nix [19995]**Summary:**

Paragraph 210 states that the plan “actively protects, promotes and enhances biodiversity, so that development results in biodiversity net gain.”

There is very little in the plan to support this statement. In what ways will biodiversity be enhanced?

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24276

Object

**The Growth Strategy, 188****Respondent:** Ann Nix [19995]**Summary:**

Villages

Paragraph 188d states "The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages." Where is the innovative approach? The best way to sustain rural communities is to ensure that they are well connected to local service centres, retail and cultural facilities, and employment opportunities. There is little sign of this in the plan

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24399

Object

**Transport, 240****Respondent:** Mr Michael Nix [20005]**Summary:**

I would like to express my concerns about the Greater Norwich Local Plan. I consider that the Plan should not include the Norwich Western Link Road scheme which is incompatible with planned carbon reduction objectives. The proposed road should not be included because of the planning issues associated with it which are not surmountable. This is in the context of the Wensum SAC and the Habitats Regulations and in relation to the importance of the river being a chalk stream habitat. Furthermore, the Plan fails to present a coherent policy on climate change, and fails to propose a carbon budget for the area. In addition, I note that the Plan increases housing numbers above those demanded by central government and are in excess of what is environmentally sustainable. Lastly, the Plan fails as a "balanced sustainable development" and does not comply with the UN's Sustainable Development goals which aim to protect the environment while achieving social and economic gains.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23568

Object

**Marsham, 2143 Policy****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

Noble Foods Ltd has requested that land south of Le Neve Road in Marsham (Site Ref. GNLP2143) is deleted as an allocation because it is not sound and would lead to significant impacts on heritage assets and landscape character. Noble Foods Ltd is promoting an alternative site for a residential allocation in Marsham, at Fengate Farm (Site Ref. GNLP3035). The Fengate Farm site contains vacant and unused buildings and areas of hardstanding associated with a former poultry unit. The former poultry use ceased in 2011. The buildings were damaged by fire in early 2020.

**Change suggested by respondent:**

To allocate the following site as an alternative to GNLP2143:

Policy GNLP3035: Land at Fengate Farm, Marsham (approx. 3.06 ha) is allocated for residential development. The site is likely to accommodate approximately 35 homes. The main vehicular and pedestrian access would be via Old Norwich Road, with Fengate providing an emergency and pedestrian/cycle access.

The policy wording could identify the technical surveys to be prepared for a planning application, the existing features on the site to be retained, and any specific design issues to be included within the development.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** E20872 Fengate Farm, Marsham Preliminary Ecological Appraisal.pdf -<https://oc2connect.gnlp.org.uk/a/453>Fengate Farm\_Access Appraisal\_v1.pdf - <https://oc2connect.gnlp.org.uk/a/454>9862 FPCR Marsham Landscape Appraisal.pdf - <https://oc2connect.gnlp.org.uk/a/455>

Fengate Farm and Land S of Le Neve Road, Marsham - Heritage Report January 2021.pdf -

<https://oc2connect.gnlp.org.uk/a/456>

23521

Object

**Delivery, Delivery Statement****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to the Delivery Statement. Vision and Objectives. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that land at Fengate Farm in Marsham (Site Ref. GNLP3035) is specifically allocated in Draft GNLP or is incorporated into the village boundary to enable the delivery of affordable housing.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23520

Object

**The Plan's Objectives, 151****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to the Vision and Objectives. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that Site Allocation GNLP2143: Land south of Le Neve Road in Marsham is deleted to be consistent with objectives to protect the natural and historic environments.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23522

Support

**Addressing Climate Change, Climate Change Statement****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23523

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is requested that Policy 1 includes confirmation that the circumstances identified in Paragraphs 010 and 024 of Id.2a of the Planning Practice Guidance are included in the housing target for Draft GNLP e.g. adjustments for economic growth, strategic infrastructure and to meet affordable housing needs.

No modifications are required to the settlement hierarchy in respect of Marsham.

**Legally compliant:** Yes**Sound:** No**Comply with duty:** Yes**Appear exam:** Written Representation**Attachments:** None

23525

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to Policy 3. However, it is requested that the site assessment is corrected, and modifications are made to the proposed allocation in Marsham, including that Site Allocation GNLP2143: Land south of Le Neve Road is deleted, so that the requirements of Policy 3 can be achieved.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23524

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to Policy 2. However, it is requested that modifications are made to the allocations in Marsham to ensure consistency with Policy 2 in terms of protecting landscape and heritage assets i.e. that Site Allocation GNLP2143: Land south of Le Neve Road in Marsham is deleted and land at Fengate Farm (Site Ref. GNLP3035) is identified as an alternative allocation for residential development.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23526

Support

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

Policy 4 deals with infrastructure, including local infrastructure that could be delivered on site or via the provision of land or planning obligations. It is anticipated that the promoted development at land at Fengate Farm in Marsham (Site Ref. GNLP3035), if identified as an alternative allocation, would make appropriate planning obligations for infrastructure including education, and could also include open space and allotments if required. The requirement for planning obligations in conjunction with development is appropriate, and no changes to Policy 4 are required.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23527

Support

**Policy 5 Homes, Policy 5 Homes****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23528

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is requested that land at Fengate Farm in Marsham (Site Ref. GNLP3035) is specifically allocated in Draft GNLP as an alternative to Site Allocation GNLP2143: Land south of Le Neve Road, or Fengate Farm should be incorporated into the village boundary to enable the delivery of housing at this vacant and unused site.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23529

Object

**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is requested that land at Fengate Farm in Marsham (Site Ref. GNLP3035) is specifically allocated in Draft GNLP, or Fengate Farm should be incorporated into the village boundary to enable the delivery of housing and affordable housing at this vacant and unused site.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23530

Support

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**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

█ -

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23531

Support

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**Appendices, Appendix 5 Village Clusters in Broadland****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

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**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23566

Object

**Marsham, 2143 Policy****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

In summary, Noble Foods Ltd objects to the proposed residential allocation GNLP2143: Land south of Le Neve Road in Marsham on the basis that it is a greenfield site and development in this location would have a significant impact on heritage assets and landscape character. An alternative site at Fengate Farm (Site Ref. GNLP3035) containing vacant and unused buildings is available and has no significant constraints to development, and a suitable vehicular site access onto Old Norwich Road can be provided and a safe route to school is available from the site that avoids the use of the carriageway.

**Change suggested by respondent:**

To delete the following allocation:

Policy GNLP2143: Land south of Le Neve Road, Marsham

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Fengate Farm and Land S of Le Neve Road, Marsham - Heritage Report January 2021.pdf -

<https://oc2connect.gnlp.org.uk/a/44q>

9862 FPCR Marsham Landscape Appraisal.pdf - <https://oc2connect.gnlp.org.uk/a/45r>

Noble Foods Ltd - HELAA assessment table (updated Feb 2021).pdf -

<https://oc2connect.gnlp.org.uk/a/45s>

Noble Foods Ltd - SA Assessment Update (Feb 2021).pdf - <https://oc2connect.gnlp.org.uk/a/45t>

23569

Object

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**Site Assessment Booklets and Studies, Sustainability Appraisal Report****Respondent:** Noble Foods Ltd [19330]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

In conclusion, with corrected scores for the land south of Le Neve Road (Site Ref. GNLP2143) and land at Fengate Farm (Site Ref. GNLP3035), the Fengate Farm site scores better or equivalent to the Le Neve Road site for most sustainability objectives, and substantially better for landscape and historic environment topics. In these circumstances, the SA should have recommended that the Fengate Farm site is allocated in Draft GNLP as an alternative to land south of Le Neve Road, and this should have been the outcome if the SA were to meet the aim of making Draft GNLP more sustainable. It is not clear why the SA has favoured a greenfield site (at land south of Le Neve Road) in preference to a vacant and unused site (at Fengate Farm) for allocation in Marsham.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Noble Foods Ltd - SA Assessment Update (Feb 2021).pdf - <https://oc2connect.gnlp.org.uk/a/457>

24110

Object

**Policy HEL1, HEL1 Policy****Respondent:** Norfolk and Suffolk NHS Foundation Trust [19404]**Agent:** Bidwells (Mr Iain Hill, Partner) [16273]**Petition:** 2 petitioners**Summary:**

On behalf of Norfolk and Suffolk NHS Foundation Trust (the Trust), we continue to strongly support the allocation of Hellesdon Hospital under Policy HEL1 for approximately 300 homes and employment uses. As detailed in comments made at the Regulation 18 (C) consultation stage, the site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038.

The continued suitability of the site is detailed below. In considering the suitability of the site regard has been given to the specific requirements of Policy HEL1, as well as additional technical work, and discussions with key stakeholders, including Broadland District Council and Norfolk County Council Highways, that have taken place since the Regulation 18 (C) consultation.

However, whilst the principle of the policy is considered sound, in accordance with the tests set out in paragraph 35 of the NPPF, elements of the detailed wording are not sound, as they are neither effective or justified. Accordingly, minor alterations to Policy GNLP HEL1 are sought to ensure its soundness. These are considered in further detail below.

See attached document for full representation.

**Change suggested by respondent:**

See attached document for full representation, including proposed changes to the wording of the policy.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Representaton - <https://oc2connect.gnlp.org.uk/a/49j>

23862

Support

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**The Natural Environment, 112**

**Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]

**Summary:**

This statement fails to mention the role of GI in mitigating the impacts of recreation and visitors on more sensitive protected sites.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23864

Support

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**Water, 122**

**Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]

**Summary:**

Reference could be made to natural water management and the positive role that habitat could have on helping to balance the water demand.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23865

Support

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**Communities, 132**

**Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]

**Summary:**

Would be good to expand on access to greenspace as a key part of what makes a community healthy and attractive.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23867

Support

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**Environment, 146**

**Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]

**Summary:**

The role of greenspace, trees and habitat creation, including in urban areas, should be recognised as a key opportunity for improving air quality.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23869

Support

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**Environment, 148**

**Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]

**Summary:**

Supportive however the value of brownfield sites as open areas within urban settings should not be ignored. The potential of brownfield sites as important wildlife habitat should be recognised during development with adequate and appropriate mitigation and biodiversity net gain being put in place for any habitat loss.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23873

Support

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**Environment, 149**

**Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]

**Summary:**

Would be good to see reference to other key GI opportunities such as Wensum Parkway - a major GI opportunity within the city centre. Broadland Way and the Green Loop should also be included. The Green Loop offers potential to provide car free access to the County Park at Horsford via Marriott's Way.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23884

Support

**The Natural Environment, 223****Respondent:** Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]**Summary:**

Whilst the paragraphs above outline key related documents and concepts it would be better to have a dedicated GI Strategy addressing the needs and approaches to be taken in the GNLP area. In particular the way that any new and existing GI could be linked via active travel routes and public transport. Effective delivery of doorstep greenspace should also be included. This has become of particular interest during lockdown with many people needing to access outdoor spec close to where they live. There should also be careful consideration of the sustainable funding for long term management of these spaces.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24143

Support

**Policy 0596R, 4.9****Respondent:** Norfolk Homes Ltd [10868]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Petition:** 2 petitioners**Summary:**

Paragraph 4.9

Norfolk Homes Ltd confirms that 0.25 hectares of the site will be provided for community use to meet sustainable transport objectives, as set out in the Aylsham Neighbourhood Plan.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Aylsham masterplan 2021\_03\_13.pdf - <https://oc2connect.gnlp.org.uk/a/4v7>

24144

Object

**Policy 0596R, 4.8****Respondent:** Norfolk Homes Ltd [10868]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Petition:** 2 petitioners**Summary:**

Paragraph 4.8

It should be noted that whilst Norfolk Homes have indicated - through the submitted masterplan for the site - that there would be two points of vehicular/pedestrian access to Norwich Road, and a footpath/cycleway/emergency access to Buxton Road, there is no means or intention to access Copeman Road. The latter would require third party land, over which Norfolk Homes has no control. It is therefore recommended that reference to Copeman Road be deleted.

The error should be corrected in order to make the Plan sound.

**Change suggested by respondent:**

See above

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Aylsham masterplan 2021\_03\_13.pdf - <https://oc2connect.gnlp.org.uk/a/4v7>

24142

Object

**Policy 0596R, 0596R Policy****Respondent:** Norfolk Homes Ltd [10868]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Petition:** 2 petitioners

**Summary:**

Policy GNLP0596R

On behalf of Norfolk Homes Ltd – the owner of the Norwich Road, Aylsham site - I write in support of the proposed allocation of GNLP0596R for at least 255 homes, community use to meet sustainable transport objectives, and a 90-bed care unit/extra care housing. Norfolk Homes Ltd confirms that 0.25 hectares of the site will be provided for community use to meet sustainable transport objectives, as set out in the Aylsham Neighbourhood Plan. It also supports the intentions for the provision of care/extra care, and in particular the flexibility afforded the provision of - what is understood to be – housing under Classes C2 and C3. The landowner is presently in discussion with specialist developers, with a view to understanding the local market for such, and thus bringing forward an appropriate type/form/scale of development on site to meet such needs.

A revised/updated indicative masterplan has been prepared (and attached) to assist both the Inspector and the GNDP in understanding the landowner's broad intentions with regard to the site and pending planning application.

In discussion with the GNDP, a revised/updated Statement of Common Ground will be prepared to reflect the current position/planning status of the site. The landowners/developers have undertaken most preparatory work necessary for an application and have engaged with Broadland District Council through a formal 'pre-application' process. In principle, Norfolk Homes Ltd. seeks to prepare, complete and submit an application around the middle of 2021, to be determined by or around the time the Plan is examined (scheduled for November/December 2021). This will ensure that the emerging Plan (both in terms of strategic policies and site allocations) can be given appropriate weight in determining the application (in accordance with paragraph 48 of the NPPF) and can demonstrate soundness through the deliverability of the Plan's strategy/sites. As the determination of the application will be broadly concurrent with the closing stages of the preparation/adoption of the Plan, the applicant intends – as far as possible - that the application complies with the draft policies thereof. Norfolk Homes Ltd. look to commence development of the site - and delivery of homes, etc - as soon as possible thereafter (with a scheduled start on site of June 2022, an annual delivery rate of 25 dwellings, and a likely housing completion date for the site of June 2031).

With regard to the numbered criteria, Norfolk Homes Ltd supports these, subject to the following comments:

3. There is reference to "revision of speed limit", in relation to which we seek clarification. Norwich Road (from the A140 roundabout into the town centre) is presently 30mph; what revision is the policy proposing?
4. It should be noted that whilst Norfolk Homes have indicated - through the submitted masterplan for the site - that there would be two points of vehicular/pedestrian access to Norwich Road, and a footpath/cycleway/emergency access to Buxton Road, there is no means or intention to access Copeman Road. The latter would require third party land, over which Norfolk Homes has no control. It is therefore recommended that reference to Copeman Road be deleted.

These matters should be clarified in order to make the Plan sound.

**Change suggested by respondent:**

See above.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Aylsham masterplan 2021\_03\_13.pdf - <https://oc2connect.gnlp.org.uk/a/4v7>

23259

Object

**Policy BRU2, BRU2 Policy****Respondent:** Norfolk Homes Ltd (Mr Terry Harper, Director) [13366]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Summary:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021), it remains our view that Policy BRU2 is insufficiently up-to-date/accurate, and is thus unsound in seeking to allocate the entire site for recreational open space (please see attached).

The housing part has approval and development has lawfully commenced to build and deliver 155 dwellings, and so the option for recreational use of that land has been removed. Brundall Parish Council has planning permission for the provision of formal recreation on the remainder.

We see no difficulty in amending the proposed Plan to accurately represent what is happening/will happen on different parts of the BRU2 site, rather than continue that the site be allocated for recreational use in its entirety. Without such an amendment, we contend that the Plan - insofar as it relates to Policy BRU2 – is unsound.

**Change suggested by respondent:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021), it remains our view that Policy BRU2 is insufficiently up-to-date/accurate, and is thus unsound in seeking to allocate the entire site for recreational open space (please see attached).

The housing part has approval and development has lawfully commenced to build and deliver 155 dwellings, and so the option for recreational use of that land has been removed. Brundall Parish Council has planning permission for the provision of formal recreation on the remainder.

We see no difficulty in amending the proposed Plan to accurately represent what is happening/will happen on different parts of the BRU2 site, rather than continue that the site be allocated for recreational use in its entirety. Without such an amendment, we contend that the Plan - insofar as it relates to Policy BRU2 – is unsound.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** Policy BRU2 - March 2020 submission - <https://oc2connect.gnlp.org.uk/a/43q>

23260

Object

**Policy TROW1, TROW1 Policy****Respondent:** Norfolk Homes Ltd (Mr Terry Harper, Director) [13366]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Summary:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached – we request that Policy TROW1 is brought fully up-to-date.

The current draft Plan has been amended - from the Regulation 18 iteration – to correctly state the number of dwellings but still states that: “the second phase is pending completion of the S.106 agreement at the time of writing” (paragraph 3.83). In fact, planning permission has now been granted on Phase 2 and development lawfully commenced. We request that Policy TROW is updated accordingly.

**Change suggested by respondent:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached – we request that Policy TROW1 is brought fully up-to-date.

The current draft Plan has been amended - from the Regulation 18 iteration – to correctly state the number of dwellings but still states that: “the second phase is pending completion of the S.106 agreement at the time of writing” (paragraph 3.83). In fact, planning permission has now been granted on Phase 2 and development lawfully commenced. We request that Policy TROW is updated accordingly.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** March 2020 Representation - <https://oc2connect.gnlp.org.uk/a/43z>

23261

Object

**Rackheath, Settlement Map****Respondent:** Norfolk Homes Ltd (Mr Terry Harper, Director) [13366]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Summary:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached, planning permission has now been granted for 322 no. dwellings on land off Green Lane West, Rackheath (ref. 20171464; planning permission and site location plan attached).

We suggest that – in the interests of completeness and to provide an accurate picture of housing provision here – an appropriate note should be added to the Plan’s supporting text (probably at paragraph 3.55) and an annotation to the Settlement Map. Without such an amendment, we contend that the Plan - insofar as it relates to Rackheath – is unsound.

**Change suggested by respondent:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached, planning permission has now been granted for 322 no. dwellings on land off Green Lane West, Rackheath (ref. 20171464; planning permission and site location plan attached).

We suggest that – in the interests of completeness and to provide an accurate picture of housing provision here – an appropriate note should be added to the Plan’s supporting text (probably at paragraph 3.55) and an annotation to the Settlement Map. Without such an amendment, we contend that the Plan - insofar as it relates to Rackheath – is unsound.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** March 2020 Representation - <https://oc2connect.gnlp.org.uk/a/43m>Decision Notice - Rackheath - <https://oc2connect.gnlp.org.uk/a/43n>Location Plan - <https://oc2connect.gnlp.org.uk/a/43y>

23286

Object

**Rackheath, 3.55****Respondent:** Norfolk Homes Ltd (Mr Terry Harper, Director) [13366]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]**Summary:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached, planning permission has now been granted for 322 no. dwellings on land off Green Lane West, Rackheath (ref. 20171464; planning permission and site location plan attached).

We suggest that – in the interests of completeness and to provide an accurate picture of housing provision here – an appropriate note should be added to the Plan’s supporting text (probably at paragraph 3.55) and an annotation to the Settlement Map. Without such an amendment, we contend that the Plan - insofar as it relates to Rackheath – is unsound.

**Change suggested by respondent:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached, planning permission has now been granted for 322 no. dwellings on land off Green Lane West, Rackheath (ref. 20171464; planning permission and site location plan attached).

We suggest that – in the interests of completeness and to provide an accurate picture of housing provision here – an appropriate note should be added to the Plan’s supporting text (probably at paragraph 3.55) and an annotation to the Settlement Map. Without such an amendment, we contend that the Plan - insofar as it relates to Rackheath – is unsound.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** March 2020 Representation - <https://oc2connect.gnlp.org.uk/a/43m>Decision Notice - Rackheath - <https://oc2connect.gnlp.org.uk/a/43n>Location Plan - <https://oc2connect.gnlp.org.uk/a/43y>

23262

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Norfolk Homes Ltd (Mr Terry Harper, Director) [13366]**Agent:** Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]

**Summary:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached - it remains our view that Policy 5 – insofar as it relates to Affordable Housing - is unsound.

The 2017 SHMA identifies a need for 28% affordable housing; why then is the policy seeking a minimum of 33% (outside of Norwich City Centre)? The implication – although somewhat disingenuous – is that the shortfall arising from the Government policy of excluding affordable housing provision from housing developments of fewer than 10 units must be made up by inflating the evidentially-based 28% (SHMA) proportion. In effect, cross-subsidising the perceived 'shortfall' through major housing schemes (10 or more units). We believe there is a clear case for the Local Plan to reflect its evidence base (insofar as it relates to affordable housing) by requiring that the proportion of affordable housing sought reflects the most up-to-date needs assessment, i.e. 28%. Indeed, that the approach adopted in Policy 4 (Housing Delivery) of the adopted Joint Core Strategy (JCS) is carried forward into the new Local Plan: "The proportion of affordable housing, and mix and tenure sought will be based on the most up to date needs assessment for the plan area." Policy 5 (Greater Norwich Local Plan) only says that "a mix of affordable housing sizes, types, and tenures..." should take account of the most up-to-date evidence, not the proportion. The proportion has changed over the Plan (JCS) period – notably since the publication of the 2017 SHMA - and has been reflected in Councils' approaches to decision making thereafter.

There now appears to be a marked change in the Councils' approach to an evidentially-based and up-to date proportion of affordable housing, without justification. The GNDDP may feel it has a case to make – other than simply to make up the overall affordable housing levels through its absence in minor (sub 10 unit) developments - but we cannot find any proper rationalisation in the emerging Local Plan, nor in its supporting evidence, including the Viability Appraisal (December 2020). This is a serious omission that should be properly addressed, to avoid adverse impacts on housing delivery and viability through the Plan period. As it stands, we contend that Policy 5 is therefore unsound.

**Change suggested by respondent:**

Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached - it remains our view that Policy 5 – insofar as it relates to Affordable Housing - is unsound.

The 2017 SHMA identifies a need for 28% affordable housing; why then is the policy seeking a minimum of 33% (outside of Norwich City Centre)? The implication – although somewhat disingenuous – is that the shortfall arising from the Government policy of excluding affordable housing provision from housing developments of fewer than 10 units must be made up by inflating the evidentially-based 28% (SHMA) proportion. In effect, cross-subsidising the perceived 'shortfall' through major housing schemes (10 or more units). We believe there is a clear case for the Local Plan to reflect its evidence base (insofar as it relates to affordable housing) by requiring that the proportion of affordable housing sought reflects the most up-to-date needs assessment, i.e. 28%. Indeed, that the approach adopted in Policy 4 (Housing Delivery) of the adopted Joint Core Strategy (JCS) is carried forward into the new Local Plan: "The proportion of affordable housing, and mix and tenure sought will be based on the most up to date needs assessment for the plan area." Policy 5 (Greater Norwich Local Plan) only says that "a mix of affordable housing sizes, types, and tenures..." should take account of the most up-to-date evidence, not the proportion. The proportion has changed over the Plan (JCS) period – notably since the publication of the 2017 SHMA - and has been reflected in Councils' approaches to decision making thereafter.

There now appears to be a marked change in the Councils' approach to an evidentially-based and up-to date proportion of affordable housing, without justification. The GNDDP may feel it has a case to make – other than simply to make up the overall affordable housing levels through its absence in minor (sub 10 unit) developments - but we cannot find any proper rationalisation in the emerging Local Plan, nor in its supporting evidence, including the Viability Appraisal (December 2020). This is a serious omission that should be properly addressed, to avoid adverse impacts on housing delivery and viability through the Plan period. As it stands, we contend that Policy 5 is therefore unsound.

**Legally** Not specified

**compliant:**

**Sound:** No



**Comply with** Not specified  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** March 2020 Rep - <https://oc2connect.gnlp.org.uk/a/43p>

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**23883****Support**

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**KES2/0497, KES2 Policy**

**Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]

**Summary:**

We support the inclusion of points 6 and 8 to ensure that any potential impacts on our nearby Harford Bridge Marshes Reserve (and County Wildlife Site) are avoided.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** Not specified

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

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**23894****Support**

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**Policy REP1, REP1 Policy**

**Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]

**Summary:**

We support the inclusion of a requirement in the policy to ensure any application evaluates the potential indirect impacts of development on the adjacent Broomhill Meadows CWS.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** Not specified

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

23898

Support

**Policy SL2007 4016 HFN3, SL2007 4016 HFN3 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

We support the inclusion of point 4 requiring assessment of potential indirect impacts on Horsham Meadows CWS as part of any application.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23866

Object

**Site Assessment Booklets and Studies, Habitats Regulation Assessment (HRA)****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

The HRA is incomplete and makes recommendations for the further work necessary before a conclusion of no adverse effect can be made. Therefore at this stage there is insufficient evidence to demonstrate that adverse effects on European Sites can be avoided and therefore the GNLPS does not comply with the Habitats Regulations.

**Change suggested by respondent:**

Section 11.3.1 of the HRA sets out the outstanding matters needing resolution before the HRA could potentially conclude that the GNLPS would not result in an adverse effect on the integrity of multiple European Sites. The Water Cycle Study and GIRAMS study should be completed in order to allow for the HRA to be updated, including allowing sufficient time for consultees and stakeholders to fully review their contents and offer comments.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23871

Object

**Site Assessment Booklets and Studies, Water Cycle Study****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

The plan has failed to produce sufficient evidence that additional demands on water treatment capacity could be met in order to avoid adverse impacts on the River Wensum SAC and the Broads SAC. Therefore the plan fails to comply with the Habitats Regulations and is not legally compliant.

**Change suggested by respondent:**

We raised concerns regarding the evidence base on this matter at the previous consultation stage and are disappointed to see that this issue remains unresolved at the Regulation 19 consultation stage. The plan is reliant on the completion of the Water Cycle Study by Anglian Water to provide sufficient evidence to robustly prove that the sewage water output from all the proposed allocations is capable of being treated at WRCs to a sufficient level to avoid adverse effects on the River Wensum SAC and the Broads SAC. At present that evidence is not available and so further work is needed before the HRA can be revised.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23877

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

We have significant concerns regarding the impacts of the Western Link road proposal on wildlife. Recent independent surveys have also identified a previously unknown 'super-colony' of barbastelle bats directly on the proposed route which is likely to be the country's largest breeding colony. Given the significance of this colony and the strict legal protection afforded to bats and their roost sites under the Wildlife & Countryside Act and the Habitats Regulations, we do not believe that the NWL is deliverable. Therefore, if there are elements of the GNLP that are dependent on the NWL, these will also be undeliverable.

**Change suggested by respondent:**

The plan makes reference to the NWL as key infrastructure but it is not clear which allocations or other plan objectives are reliant on delivery of the NWL. We seek clarification from the GNLP team which housing and employment allocations (if any) are dependent on the delivery of the NWL to meet their own delivery. If any allocations are dependent on delivery of the NWL then we recommend they are reviewed to evaluate if their delivery would be compromised by the NWL failing to be delivered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23879

Object

### Addressing Climate Change, Climate Change Statement

**Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]

**Summary:**

We believe the targets set in the plan for energy efficiency and renewable energy provision do not meet the requirements of the Planning & Compulsory Purchase Act. We have serious concerns regarding the likely impacts of climate change on Norfolk's wildlife and recommend every opportunity to set zero carbon targets in the plan should be taken.

**Change suggested by respondent:**

Whilst the proposed policy targets for energy efficiency and renewable energy provision are a welcome improvement compared to previous planning requirements, we are concerned that they are missing an opportunity already taken by other local authorities to make a greater contribution to national climate change targets and increase certainty that the 2050 targets will be met. The Climate Change Committee have highlighted the need for short-term emissions cuts to help ensure that the 2050 target can be met and we recommend that the GNLP should set zero carbon targets for all new housing as seen in policy H5 of the recently adopted Reading Local Plan in order to gain the benefits as early as possible and ensure that the interim targets set in the Climate Change Act can be met. This would also match Norfolk County Council's Environment Policy, presented and approved at Full Council in November 2019, which states that they 'will work within the County at large to ensure it goes beyond the expectations of national government, as far as the national 'net zero' carbon target is concerned'.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23881

Object

### Addressing Climate Change, Climate Change Statement

**Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]

**Summary:**

We do not believe that the plan provides sufficient support for climate change adaptation measures and therefore are concerned that it does not meet the requirements of the Planning & Compulsory Purchase Act and the NPPF. A key focus of the climate change adaptation measures in the draft plan appears to focus on flood mitigation, whilst other climate change impacts such as overheating do not appear to be address by plan policy, leaving no mechanism for the plan to deliver robust positive outcomes for climate change adaptation.

**Change suggested by respondent:**

We recommend that policy needs to be modified to ensure that the plan requires new growth to deliver a suite of green infrastructure measures that deliver climate change adaptation across the range of expected impacts, including flooding, urban overheating and air quality. Given that space in new development for new open space at ground level is always at a premium, and that the physical structure of development presents opportunities for green infrastructure in the urban environment where public open space isn't possible, we strongly recommend that the plan includes an additional policy incentive to ensure that all new development in urban areas provides green infrastructure that can help the urban environment adapt to the changing climate. These include design features such as green roofs and walls, as well as biodiverse drainage features in the urban environment. These will provide multiple ecosystem services such as reducing heating, reducing rainwater runoff that would otherwise contribute to flooding and will improve air quality. This will also help link existing areas of wildlife value and increase their resilience to changes in climatic conditions. This is supported by section 4.5.1 of the 2018 National Adaptation Programme, which states that 'multifunction green infrastructure innovations offer a way to combat resilience challenges and also address stresses of urban living to improve health and wellbeing'.

We recommend that the plan's delivery of positive gains for climate change adaptation is secured through the inclusion of urban greening targets for all new development in Policy 3. Examples of similar approaches taken elsewhere in adopted local plans which demonstrate that this is a practical and deliverable policy change are policy AP12 of the Southampton City Centre Action Plan and the Urban Greening Factor in policy G5 of the draft London Plan. Such measures also align closely with the aspirations of the biodiversity net gain measure set out in Policy 3, which we support, and could be added as specific targets for the urban environment where opportunities to deliver a net gain for wildlife would otherwise be displaced to off-site provision some distance away from the development.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23882

Object

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**The Natural Environment, 218****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

The plan fails to provide sufficient measures to ensure that adverse effects on European Sites from visitor pressure would be avoided. Therefore the plan is not in compliance with the Habitats Regulations. Whilst we support the inclusion in Policy 3 of a requirement for visitor pressure to be addressed in planning applications, the draft plan lacks the certainty that the necessary measures will be in place prior to adoption to provide certainty that adverse effects from visitor pressure. will be avoided. At present the GIRAMS report is still in draft form awaiting approval from the Norfolk Strategic Planning Group.

**Change suggested by respondent:**

The plan is reliant on the completion of the third-party GIRAMS report and incorporation of its recommendations into the policy text. Without this, there is no certainty that such funds will be collected and spent on the necessary measures to ensure that the adverse effect is avoided and therefore there would be no mechanism in the plan to prove that it can avoid adverse visitor pressure impacts on European Sites.

The GIRAMS report needs to be approved by the Norfolk Strategic Planning group, any recommended policy wording from the GIRAMS will need incorporating into the GNLP policy text and sufficient evidence will need to be given that the relevant fundholding and delivery body recommended in the draft GIRAMS will be established prior to adoption of the GNLP, so that delivery of all its recommendations so far as they apply to the GNLP area can be guaranteed.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23888

Object

**Policy 0132, 0132 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

The proposed allocation is adjacent to a County Wildlife Site and includes ancient woodland within its boundary. In line with precautionary text already included for other allocations adjacent to important habitats in the plan, we recommend that additional policy requirements are set out to ensure that impacts to important habitats are avoided.

**Change suggested by respondent:**

Both woodland sites will need protection from direct proximity to development, as well as provision of additional on site green infrastructure in order to relieve disturbance pressure. The masterplan should also ensure that no built development is located within 100m of the ancient woodland, in line with recommendations made by the Woodland Trust (<https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/>). The masterplan should also ensure that appropriate funds are secured for the long term management of the ancient woodland to ensure that its wildlife value is safeguarded and any additional visitor pressure impacts from the new housing mitigated for.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23889

Object

**Policy 0102, 0102 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

The site is adjacent to Frenze Beck County Wildlife Site, which forms a vital part of the local green infrastructure, which will also be vulnerable to additional impacts from the significant additional of residential development.

**Change suggested by respondent:**

As the allocation will lead to additional visitor pressure on the CWS, we strongly recommend that the need to assess and provide mitigation for these impacts is added to the policy text, in line with similar approaches made in other allocations with potential impacts on nearby CWSs.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23890

Object

**Policy HETHEL1, HETHEL 1 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

These allocations are adjacent to Hethel Wood CWS, an important ancient woodland site, likely to also be of importance for several bat species.

**Change suggested by respondent:**

Given the proximity of the existing industrial area to the wood, and the sensitivity of ancient woodland to nearby development, we recommend that any allocations in this area include additional policy text specifically requiring the any applications to specifically address potential impacts on the CWS and ancient woodland from impacts including encroachment and light pollution. This area is also a key location for connectivity with other priority habitats in the south Norfolk claylands and net gain contributions could help link Hethel Wood with other nearby County Wildlife Sites and ancient woodland, improving their ecological value.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23892

Object

**Policy HETHEL 2, HETHEL 2 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

This allocation is adjacent to Hethel Wood CWS, an important ancient woodland site, likely to also be of importance for several bat species.

**Change suggested by respondent:**

Given the proximity of the existing industrial area to the wood, and the sensitivity of ancient woodland to nearby development, we recommend that any allocations in this area include additional policy text specifically requiring the any applications to specifically address potential impacts on the CWS and ancient woodland from impacts including encroachment and light pollution. This area is also a key location for connectivity with other priority habitats in the south Norfolk claylands and net gain contributions could help link Hethel Wood with other nearby County Wildlife Sites and ancient woodland, improving their ecological value.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



23893

Object

**Policy 2109, 2109 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

This allocation is adjacent to Hethel Wood CWS, an important ancient woodland site, likely to also be of importance for several bat species.

**Change suggested by respondent:**

Given the proximity of the existing industrial area to the wood, and the sensitivity of ancient woodland to nearby development, we recommend that any allocations in this area include additional policy text specifically requiring the any applications to specifically address potential impacts on the CWS and ancient woodland from impacts including encroachment and light pollution. This area is also a key location for connectivity with other priority habitats in the south Norfolk claylands and net gain contributions could help link Hethel Wood with other nearby County Wildlife Sites and ancient woodland, improving their ecological value.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23895

Object

**Policy 0608R, 0608R Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

This proposal is in close proximity to Lenwade Pits West CWS. We recommend that the site policy is updated in line with all other proposed allocations in proximity to CWS with a reference to the need for an ecological assessment as part of any application.

**Change suggested by respondent:**

This proposal is in close proximity to Lenwade Pits West CWS. We recommend that the site policy is updated in line with all other proposed allocations in proximity to CWS with a reference to the need for an ecological assessment as part of any application.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23899

Support

**Policy BAW2, BAW2 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

We support the policy requirement that any proposals for this site, which is designated in its entirety as a County Wildlife Site, would need to ensure that its ecological value is retained and enhanced if it is to be made open to the public, through a conservation management plan tied to any permission.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23900

Object

**South Norfolk - Non residential, BKE3 Policy****Respondent:** Norfolk Wildlife Trust (Mr Mike Jones) [17875]**Summary:**

This proposal is directly adjacent to Atlas Gravel Workings CWS. We recommend that the site policy is updated in line with all other proposed allocations in proximity to CWS with a reference to the need for an ecological assessment as part of any application, in order to ensure that any development does not lead to permanent impacts to the adjacent CWS. This is likely to include a requirement for a buffer between any development and the CWS boundary, to safeguard against indirect impacts such as noise and light pollution.

**Change suggested by respondent:**

We recommend that the site policy is updated in line with all other proposed allocations in proximity to CWS with a reference to the need for an ecological assessment as part of any application, in order to ensure that any development does not lead to permanent impacts to the adjacent CWS. This may include a requirement for a buffer between any development and the CWS boundary, to safeguard against indirect impacts such as noise and light pollution.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24284

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Norwich Apex Limited [19546]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Petition:** 2 petitioners**Summary:**

In respect of emerging 'Policy 6 - The Economy' in the Reg 19 plan, it is notable that there is very little new land being allocated within the strategic employment sites with a lot of the older sites 'rolled over' into the employment land supply. In combination, KES/GNLP0497 and GNLP3047 would amount to circa 27 hectares of employment land in a sustainable location, with good access to the highway network, but also proximate to Norwich Ccentre (with associated and emerging sustainable transport links). Additionally, site specific infrastructure is coming forward. GNLP3047 provides the opportunity to contribute to delivering the employment objectives of the emerging GNLP and specifically Policy 6, and should be included in the plan.

See supporting letter and previous reps from March 2020 accompanying this form.

**Change suggested by respondent:**

As noted above, the allocation of additional land at Keswick to the south of KES2 will support the plan in delivering on its employment objectives.

The land identified as GNLP3047 should be included in the plan.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Land at Harford (Harford 2) - GNLP Rep March 2020 FINAL.pdf -<https://oc2connect.gnlp.org.uk/a/4ck>Cover Letter Harford 2 GNLP3047 March 2021 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cz>

24285

Object

**Cringleford, Settlement Map 2****Respondent:** Norwich Apex Limited [19546]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Petition:** 2 petitioners**Summary:**

In respect of emerging 'Policy 6 - The Economy' in the Reg 19 plan, it is notable that there is very little new land being allocated within the strategic employment sites with a lot of the older sites 'rolled over' into the employment land supply. In combination, KES/GNLP0497 and GNLP3047 would amount to circa 27 hectares of employment land in a sustainable location, with good access to the highway network, but also proximate to Norwich Ccentre (with associated and emerging sustainable transport links). Additionally, site specific infrastructure is coming forward. GNLP3047 provides the opportunity to contribute to delivering the employment objectives of the emerging GNLP and specifically Policy 6, and should be included in the plan.

See supporting letter and previous reps from March 2020 accompanying this form.

**Change suggested by respondent:**

As noted above, the allocation of additional land at Keswick to the south of KES2 will support the plan in delivering on its employment objectives.

The land identified as GNLP3047 should be included in the plan.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Land at Harford (Harford 2) - GNLP Rep March 2020 FINAL.pdf -<https://oc2connect.gnlp.org.uk/a/4ck>Cover Letter Harford 2 GNLP3047 March 2021 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cz>

24556

Object

**KES2/0497, KES2 Policy****Respondent:** Norwich Apex Limited [19546]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Petition:** 2 petitioners**Summary:**

In respect of emerging 'Policy 6 - The Economy' in the Reg 19 plan, it is notable that there is very little new land being allocated within the strategic employment sites with a lot of the older sites 'rolled over' into the employment land supply. In combination, KES/GNLP0497 and GNLP3047 would amount to circa 27 hectares of employment land in a sustainable location, with good access to the highway network, but also proximate to Norwich Ccentre (with associated and emerging sustainable transport links). Additionally, site specific infrastructure is coming forward. GNLP3047 provides the opportunity to contribute to delivering the employment objectives of the emerging GNLP and specifically Policy 6, and should be included in the plan.

See supporting letter and previous reps from March 2020 accompanying this form.

**Change suggested by respondent:**

As noted above, the allocation of additional land at Keswick to the south of KES2 will support the plan in delivering on its employment objectives.

The land identified as GNLP3047 should be included in the plan.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Land at Harford (Harford 2) - GNLP Rep March 2020 FINAL.pdf -<https://oc2connect.gnlp.org.uk/a/4ck>Cover Letter Harford 2 GNLP3047 March 2021 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cz>

24307

Support

**KES2/0497, KES2 Policy****Respondent:** Norwich Apex Limited [19546]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Summary:**

Norwich Apex fully support this proposed policy allocation. The land presents the opportunity to provide additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing jobs growth in the Greater Norwich Area over the plan period.

It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30,000 sq. meters of employment floorspace across the 'B' uses and potentially other employment generating uses. A development of this nature could deliver circa 1000 new jobs.

See supporting letter and previous reps from March 2020 accompanying this form.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Appendix 1 - Harford 1 - GNLP 0497 Reps March 2020 FINAL.pdf -

<https://oc2connect.gnlp.org.uk/a/4dt>

Cover Letter - Harford GNLP0497 KES2 Reg 19 Rep 03.21.pdf - <https://oc2connect.gnlp.org.uk/a/4d3>

24490

Object

**Infrastructure, 76****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]

**Summary:**

We comment on clause 76 as background to our response on Transport Policy 4.

The statement about relatively poor infrastructure limiting growth stands in stark contradiction to the Economy Profile which describes Greater Norwich as a world leader in plant and climate change research, a nationally significant retail centre, a centre for financial services and a national contributor to the UK's food supply and part of the wider area's world leader status in off-shore wind energy.

It is the case that Greater Norwich has historically poor public transport and local rail infrastructure relative to other cities. This acts as a major constraint in trying to encourage modal shift to sustainable modes of transport and is a barrier for the significant percentage of households without private transport in endeavouring to access employment, education and other essential services.

We disagree with the frequent and persistent claim that Norfolk is a poor relation in terms of the road network compared to the south-east and London. This is rolled out as 'evidence' that the local road network is holding back development and that further dualling of Norfolk's roads is essential for growth. This attitude has skewed the County's priorities and spending. (in 2016 Norfolk County Council voted spending on the Norwich Western Link, the 3rd Great Yarmouth River Crossing and the Long Stratton Bypass as the County Council's top spending priority for the future) and its transport agenda in favour of road building and accommodating travel by private car.

A large body of academic research has challenged assumptions about the effects of new road infrastructure and economic growth (for example ); on how we cannot build our way out of congestion and on how optimistic traffic predictions can lead result in building surplus road space.

Road improvements add vehicle capacity and speed up journey times, encouraging people to live further from their workplaces; this in turn leads to more dispersed development, increased reliance on car use, more congestion and pollution and more demands for improved roads.

Nonetheless, Norfolk County Council has demanded much larger road schemes than necessary for addressing localised problems or for serving new development. For example, the A11/A47 Thickthorn Junction is a major project which Highways England acknowledges will increase carbon emissions. The Agency originally proposed a small scheme with the objective of assisting buses to negotiate the A11/A47 Thickthorn roundabout and serve new housing growth along the A11 corridor. Norfolk County Council lobbied for a major junction improvement with the aim of increasing road capacity and serving housing growth. To address the likelihood of an enlarged junction attracting single occupant car commuters travelling short distances, the Council proposes expanding Thickthorn park and ride. This mirrors the story at A47 Postwick Junction, where the County Council doubled the capacity of Postwick Park and Ride in 2014 on the back of Postwick Hub and ended up leasing unfilled spaces to Aviva at the adjacent Broadland Business Park.

The County Council frequently cites the rural nature of Norfolk and reliance on the private car as a reason for road improvements. This argument is over-stated. A majority of the Norfolk population lives in Norwich, Great Yarmouth, King's Lynn and 21 market towns where there is considerable scope for people switching to active travel and public transport. Most journeys in the UK are short. In 2017, 67% of journeys were under five miles; a further 15% were between five and ten miles, whilst journeys of over 10 miles made up less than a fifth of all trips. Over 60% of journeys of between one to two miles are made by car or van.

An example of Norfolk's reliance on car use is Wymondham along the A11 corridor, nine miles from Norwich with direct rail links to Norwich and Cambridge. Census data (2011) shows that 22.1% of residents in Wymondham travel less than 2km (walking distance) to work and 30.2% travel less than 5km (cycling distance) to work. On the other hand, 71.8% of Wymondham residents (2011 Census), drive to work, mainly in Norwich. A conclusion of the market towns study is that travel pattern data shows the huge potential for a shift to active modes of transport for commuting.

For further information see attachment.

**Change suggested by respondent:**

The statement, 'Historically relatively poor strategic infrastructure links limited growth in the area' is only partially correct and should read:

"Whilst the strategic and local road network is largely in place, poor public transport and rail infrastructure limit accessibility to employment and essential services and discourage modal shift to sustainable transport modes".

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx -  
<https://oc2connect.gnlp.org.uk/a/4gj>

**24493**

**Object**

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**Emissions and Climate Change, 93**

**Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]



**Summary:**

We agree that mitigating the effects of climate change within the Greater Norwich area should be a cornerstone of the GNLP.

Although the GNLP has been strengthened by a stated objective to reduce per capita emissions and contribute to meeting the national target to achieve net carbon zero by 2050, the strategy for growth and supporting policies are not in line with S19 (1A) of the Planning and Compulsory Purchase Act 2004.

In 2021, government will set the level of the sixth carbon budget, covering 2033 to 2037. This will require faster progress in reducing emissions as the UK emissions are currently projected to exceed the legally binding 4th and 5th carbon budgets for the years 2023 to 2027 and 2028 to 2032.

The Committee on Climate Change is advising that the UK set its sixth Carbon Budget to require a 63% reduction in emissions across all sectors including international aviation and shipping between 2019 and 2035 (a reduction in UK of emissions of 78% by 2035 relative to 1990).

The GNLP Plan period 2018 – 2038 will be a critical period for local councils to contribute to net zero greenhouse gas emissions by 2050 and hence the vital importance of crafting and adopting a Local Plan which meets the challenge.

The Centre for Sustainable Energy, Dr Andrew Boswell and others address the planning framework for climate change and local plans. We would like to make the following observations about the lack of priority given to climate change during plan preparation.

The GNLP Regulation 18 Growth Options Consultation (early 2018) treated climate change as a subordinate matter. The Foreword, 'The Choices We Face' bracketed climate change along with other environment issues in the Draft Vision and Objectives viz:

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

The GNLP's Favoured Option on climate change was the 'Current Policy Approach' (ie that taken by the adopted Joint Core Strategy (2011)) based on minimising greenhouse gas emissions in new development, with no reference to addressing the contribution made by transport.

The GNLP Regulation 18 Consultation was deferred by 3 months to Jan 2020 to address various shortcomings raised by GNLP members that included the need for improved actions to address climate change. (GNLP Member Board Meeting Minutes 26 Sept 2019).

The GNLP Regulation 18 C (Consultation 29 Jan to 16 March 2020) was strengthened to reflect current thinking on climate change viz:

Environment Objective

"To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050."

Nevertheless, the added reference to net zero was not reflected in the body of the Plan. At the GNLP Board on 6 Jan 2020, a member questioned whether measures in the Strategy for a low carbon future were sufficiently robust.

The GNLP Board agreed to carry out further work on housing needs and delivery issues, a viability study and CIL evidence and economic evidence, but notwithstanding some member concerns over climate change, no further work was agreed on this score.

Plans for further consultation were upended by the Planning White Paper in late July 2020 and the GNLP decided to take a Regulation 19 GNLP to consultation in early 2021.

Norfolk planning authorities will now pursue climate change work through the Norfolk Strategic Planning Framework Forum. A paper 'Climate Change and the Planning System' tabled at the forum on 25 January 2021

identified current opportunities for the planning system to support decarbonisation. Alongside, members agreed through the revised draft Norfolk Strategic Planning Framework to address climate change more fully through a policy review of the GNLP following its adoption.

Deferral would result in several years' delay before a Local Plan that is better aligned with climate change policies is adopted. Meanwhile, the GNLP is relying on central government policy changes for carbon cuts.

**Change suggested by respondent:**

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**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx -  
<https://oc2connect.gnlp.org.uk/a/4gj>

## 24503

## Object

### Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy

**Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]

#### Summary:

Policy 1: The Sustainable Growth Strategy

The GNLP is unsound. The number of new dwellings and deviation from the Government's standard methodology using 2014-based projections is not justified and additional homes would increase carbon emissions.

The total provision of new dwellings has been raised from 40,541 to 49,500 with an unjustifiable increase in the buffer from 5%, as required by the NPPF, to 22%, a figure that the GNLP describes as 'significant' and has not been subject to public consultation. In addition, to this allocation, a minimum of 1,200 new homes will be provided in South Norfolk Village Clusters Housing Site Allocations document and 250 will be provided through allocations in the Diss and area Neighbourhood Plan, which are outside the purview of this consultation.

The experience of a high housing target in the Joint Core Strategy has been the difficulty of meeting a five-year housing land supply leading to developers winning planning appeals to build on greenfield sites unallocated in the JCS. Local councils are keen to grant planning permission for new homes, but the rate of delivery is in the hands of developers. Before the recent spurt in local housing delivery, Greater Norwich was below the five-year housing land target. This was not due to any unwillingness on the part of the councils to grant planning permission, but to the slow rate of housing completions. Buildings rates have increased in the past three years leading to a current housing land supply for Norwich (March 2021) of just over 6 years which does not suggest a shortage of sites.

The GNP local planning authorities are keen on high housing targets for several reasons. Firstly, to deliver affordable homes, although ironically the Councils have experienced repeated problems of developers challenging housing viability which led for several years to considerable under-delivery of affordable dwellings. We have seen an improvement in the number of affordable homes being built in Norwich in the last three years, but this has been largely achieved by the City Council building council homes. Secondly, housing growth at a strategic scale attracts central government investment. These above reasons do not justify inflating the housing figures because the downside is that the external environmental impacts such as carbon emissions and traffic growth are borne by society. Over 70% of the locations identified for the quantum of proposed housing are greenfield land which will increase journey distances and reliance on the private car. The SEA of the GNLP calculates that the proposed development of 49,492 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area by 27.1% (565,079 tonnes based on 2018 estimates), for example due to allocating housing on a total of 84 sites located on previously developed land (1,091ha) . (Residual Effects from the GNLP). In response, the GNLP says that the increase in the number of residents is over-stated as a large proportion of need for new homes arises from the existing population and that the strategy for future development is to focus growth in the more sustainable locations.

The GNP underestimates the impact of new housing on greenfield land. These include the loss of agricultural land; the increase in buildings and hard paving, contributing to temperature rise, and the additional resources used by the population living in smaller households and occupying more housing such as car ownership, water usage and waste creation, the latter which is increasingly being sent for carbon intensive energy from waste incineration.

The GNLP argument that new homes will be located in more sustainable locations with the potential for non-vehicle modes of travel. However, this argument does not bear out the reality in Norfolk where even in large market towns such as Wymondham where a majority of even short journeys take place in the car. Norfolk County Council's depiction of the

County as a rural place which will remain reliant on the private car allows the Council to continue to argue for road improvements. The GNLP is trying to face both ways in claiming that housing in rural areas is sustainably acceptable and then arguing for improvements of the road network to support rural dwellers.

It is for this reason that the Green Group is opposed to Village Clusters amounting to the rural dispersal of housing to places with no or few services. South Norfolk Council's argument has been that electric vehicles will be the panacea. However, this is not the case that electric vehicles will save the transport sector from having to addressing its mega carbon impact and allow business-as-usual- to continue. Dispersal of development adds to journey distances and to environmental impacts such as congestion close to urban areas, leading to demands for road building which together with embodies carbon in vehicle manufacture, involves considerable carbon in constructing new roads.

Weight should be given to draft consultation NPPF (Jan 2021) and the replacement policy on sustainable development for clause 11a):

'Plans and decisions should apply a presumption in favour of sustainable development.

11a) 'Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'.

We support the concentration of development in and around the Norwich urban area. However, we disagree with the allocation of a contingency site at Costessey for around 800 homes in relation to our argument about the excessive number of dwellings overall. It would be more sustainable to consider East Norwich which is within easy walking distance of the city centre, bus and railway stations.

#### Change suggested by respondent:

We would like to see a greater reliance on windfalls on brownfield sites. It is highly likely that a generous number of windfall sites will come forward given the shake up of the economy, for example, loss of city centre retail and conversion of offices to dwellings. The GNLP states that evidence provides an estimated 4,450 homes from resulting from windfall development. Yet, only 1,296 dwellings have been allowed under windfalls, even though the GNLP acknowledges that 'windfall development is likely to remain robustly high'.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

## 24504

## Object

### Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure

**Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]

#### Summary:

Policy 4: Transport

The GNLP is unsound

- Not positively prepared: the GNLP Policy 4 on Transport relies on an inadequate and incomplete evidence base. GNLP Transport Policy 4 is a summary of Draft Norfolk Local Transport Plan 4 Strategy (Draft LTP4) and the Strategy has not yet produced a chapter relating to Norwich. Only one strategy was consulted upon: continuation of the approach in the adopted Joint Core Strategy 2006 – 2026, as informed by the Norfolk LTP3 2011-2026 and now being reflected in the Draft LTP4, which as it stands would not meet the area's objectively assessed needs in relation to climate change. Alternative strategies which would cut carbon emissions on a path to Net Zero and that include traffic reduction

measures were not considered.

- Not consistent with national policy. Draft LTP4 Strategy will increase transport carbon emissions and is not consistent with the legally binding target of Net Zero

Not justified: the Draft LTP4 Strategy and proposed Policy 4 on Transport would result in additional traffic growth and carbon emissions. The Sustainability Appraisal (SA) of Draft LTP4 incorrectly concluded that the Draft LTP4 Strategy would have a positive impact on carbon emissions. It incorrectly concluded that there was no need to consider reasonable alternatives to the Draft LTP 4 Strategy with regard to climate change. In the SA Scoping Report, the SA incorrectly accepted the Norwich Western Link as part of the current baseline.

Not effective: Draft LTP4 Strategy and GNLP Policy 4 would not deliver a cut in Norfolk's transport carbon emissions consistent with the need to achieve Net Zero by 2050. The Norwich chapter in the Draft LTP4 Strategy has not been published for consultation and the Norwich Area Transportation Strategy Implementation Plan 2013 (since renamed Transport for Norwich) is reaching its end date.

The GNLP should be declared unsound and a revised LTP4 Strategy prepared for framing the GNLP transport policy that involves an ambitious programme which will contribute to Net Zero.

#### Inadequate Evidence Base

The transport evidence base for the GNLP is incomplete. The GNLP Reg 19 evidence base for transport gives a link to the Greater Norwich Local Plan Infrastructure Needs Report (Jan 2021), (alongside a version relating to the Reg 18 Consultation of 2018 which has been superseded). The Needs Report is a review of the infrastructure requirements to provide for growth planned through the GNLP. It lists transport plans and strategies which have yet to be approved or published:

Norfolk Local Transport Plan 4 Draft Strategy 2021 -2036

The GNLP Policy 4 on Transport is a summary of the Draft LTP4 Strategy.

It is NCC's intention to adopt the LTP4 in April 2021. The Green Party view is that further work is required on this wholly inadequate document. As a start, the consultation version (autumn 2020) included two national climate change targets under the Climate Change Act 2008: an 80% reduction in carbon emissions on the 1990 baseline by 2050 and further on, a reference to net zero by 2050. The document is a continuation of Norfolk LTP3 2011 – 2026 in seeking to address carbon reduction, tackle the infrastructure deficit on major road, rail and bus connections, ensure good transport connections in urban areas and towns to serve planned growth that includes bus priority lanes on certain corridors, improve connectivity between rural areas and services in urban centres and support new transport technology to respond to a changing society and economy.

Draft LTP4 Strategy does not contain a separate chapter on Norwich which instead is addressed in a sub-section amounting to one third of a page in a chapter on Increasing Accessibility where the County's ambition for Norwich is expressed thus:

"NCC (Norfolk County Council) want to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network, in particular through the completion of the Norwich Western Link."

We read in the Sustainability Appraisal of LTP4 (3.2.7) that the assessment of the Transport for Norwich strategy policies will be reported on separately, once it becomes available, and will be appended to the SA Report. This had not happened. Norwich City Council responded to the draft LTP pointing out that LTP4 contained seven short paragraphs on Norwich, that Norwich Area Transportation Strategy Implementation Plan (NATS, 2013) was out of date and Transport for Norwich update overdue, undermining the ability to plan land use and transport together. In relation to general content of Draft LTP4, the Council commented:

Our overall view is that the document is deficient due to a lack of clarity of expression, with too many words and too few images; generic policies that unsuccessfully attempt to straddle the needs of the City and the rest of the County; specific commitments to infrastructure schemes that promote long distance car-based connectivity but a lack of equivalent scheme commitments that would support the more environmentally progressive policies in the document; and a general lack of ambition and recognition that the world must be radically different by the end of the plan period..... (para 1.9)

The City Council offered a set of high-level policy principles and interventions for incorporating into the suite of transport policy documents being updated.

#### Transport for Norwich Strategy

The GNLP Reg 19 evidence basis for transport gives a link to Transport for Norwich webpage which as noted above is becoming out of date.

#### Norfolk Rail Prospectus

A consultation to update rail priorities contained in the 2013 Prospectus was carried out in early 2020, but a final version has not been published. The 2013 Plan listed new stations at Postwick and at Broadland Business Park on the Wherry and Bittern lines as medium-term aims and it advocated a new station on the Bittern Line at Rackheath for investigation in conjunction with developer proposals for the North East Norwich Growth Triangle, but there has been little progress.

#### GNLP Policy 4 on Transport would increase transport carbon emissions

GNLP Policy 4 would increase transport carbon emissions, contrary to Net Zero.

In their Sixth Carbon Budget Report, the Climate Change Committee advises on the need for a 70% reduction in surface transport emission by 2035 and for year-on-year reduction in traffic growth under the Balanced Pathway to Net Zero by 2050.

Surface transport has made little progress to date; emissions have fallen by just 1% since 2011 due to the increase in road traffic and rise in the sales of heavier sports utility vehicles, cancelling out expected reductions from sales of electric and hybrid vehicles.

The SA/SEA Scoping Study for Draft LTP4 Strategy considers the current baseline for transport. It notes:

- 'Transport is one of the largest contributors to greenhouse gas emissions in Norfolk'.
- "There was no change in emissions related to transport between 2016 and 2017 which remained at 27% (125.9 MtCO<sub>2e</sub>)."
- Transport carbon emissions increased for all Norfolk authorities between 2015 and 2016. (Table 3.13). Total CO<sub>2</sub> emissions from transport were highest in South Norfolk District Council, which accounted for 424.6 kt CO<sub>2</sub> in 2016, and the lowest emissions were in Norwich City Council with 132.3 kt CO<sub>2</sub>.

Notwithstanding this negative situation, the SA/SEA Report assessment of LTP4 is :

'Policies have resulted in predominantly significant positive effects on climate change and carbon emissions.'

The LTP4 policies largely rely on electric vehicles to do the heavy lifting work on cutting carbon emissions, together with an enhanced degree of modal shift. However, there is growing scepticism that electric vehicles will solve carbon emissions from road transport.

THE SA does not recommend the need for alternative strategy in order to achieve radical cuts in greenhouse gases.

Furthermore, it suggests that a Norwich Western Link should form part of the Scoping Report baseline. We note that WSP who conducted the SA of Draft LTP4 also lead on the NWL for Norfolk County Council.

The SA/SEA of the GNLP (Jan 2021) tabulates the carbon emissions for all local authorities in Norfolk for 2016, 2017 and 2018, (an additional year on the SA of the Draft LTP4 Strategy). Table 9.4 shows that carbon emissions for transport increased in all three years in South Norfolk and Broadland. Transport emissions in Norwich increased between 2016 and 2018 and fell slightly in 2018. Emissions from the transport sector in Broadland were more than double the figure for Norwich, whilst South Norfolk was more than three times the level for Norwich.

This trajectory for Broadland and South Norfolk ought to have set alarm bells ringing for Norfolk County Council and put them on a different path. Policy 4 is the continuation of Business As Usual.

Recent major road schemes around Greater Norwich are adding to transport carbon. The Norwich Northern Distributor Road (NDR) will increase Norfolk's transport carbon emissions by 6.17% between 2018 and 2032. Dualling of the A11 between Ketteringham and Cringleford increased traffic volumes by 25% between 2012 and 2017 is part of the explanation in the huge growth in South Norfolk's transport carbon emissions. Nonetheless, Draft LTP4 continues to promote strategic road connections such as the Norwich Western Link. In addition, national strategic road schemes sought by Norfolk will further bump up emissions. Highways England recognise that A47 North Tuddenham to Easton scheme and the A47/A11 Thickthorn Junction Improvement will increase greenhouse gas emissions.

Norwich Airport is a further source of greenhouse gases. Optimistic assumptions about future expansion of national and

regional airports are open to question following the Climate Change Committee Sixth Budget report and recommendation,

'that there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand'. (Table p81, p29).

#### Need for an ambitious transport strategy based on traffic reduction

Because most local authorities in Norfolk have allowed transport carbon emissions to rise with little check, in particular levels in South Norfolk and Broadland, radical action will be necessary to address the problem. Transport can no longer rely on other sectors to achieve net zero.

An important lesson to be drawn is that the Transport for Norwich Strategy has lowered emissions in tandem with local population and economic growth by encouraging modal shift and cutting traffic in Norwich city centre. On the other hand, traffic around the periphery of Norwich, along strategic road corridors and in rural areas continues to grow in consequence of planning and transport decisions.

In built up areas, Government transport policy is encouraging modal shift and active travel through a number of policy papers such as 'Decarbonising Transport'. In his Ministerial Foreword, Grant Shapps, Transport Minister declares:

'Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network'.

The growth in digital technologies coupled with the covid-19 pandemic has speeded up changes in society with ramifications for transport and travel, such as the greater moves to on-line shopping and home working and the vital importance of fast broadband. The GNLPP transport policy must reflect these upheavals and the overarching need to radically cut carbon from the transport sector. We need to see measures that:

- Support for low car and car free living in high density communities concentrated around Norwich. The Centre for Sustainable Energy paper proposes changes to the text on Policy 4 Strategic Infrastructure Transport relating to non-car modes with a target for 'half of all journeys in towns and cities being cycled or walked by 2036' and additional wording on the need for new infrastructure in support of this.
- Enable substantial modal shift through well-funded comprehensive \* packages to include the types of measures set out in the Norwich City Council response on the Draft LTP4 consultation.
- An end to further major road building to accommodate traffic growth. The future of travel and will be heavily shaped by information technology and digitally connected Smart infrastructure.

\*Comprehensive means simultaneous consideration of bus, rail, cycling, walking, park and ride, information services, marketing, traffic management, allocation of road capacity among the competing users, formal travel planning in residential areas, workplaces, schools, and other major attractors, parking provision, telecommunication impacts (home working, work conferences), traffic calming in residential areas and pedestrianisation.

#### Transport Policy 4: Norwich Western Link

We strongly object to this road scheme on soundness grounds. The NWL should be deleted from Transport Policy 4. The fact that the NWL has not been allocated in the GNLPP suggests that growth identified is not dependent on the NWL for its delivery.

Given the reference to the NWL in implementing the Transport for Norwich Strategy, it should be a subject for discussion at the plan examination (with a view to its deletion).

Not positively prepared: NPPF Para 102 states that "transport issues should be considered from the earliest stages of plan-making..." The NWL referred to in Policy 4 is not an allocation in the emerging plan and officers inform us that adoption of the GNLPP will not result in a route being safeguarded. However, Norfolk County Council regards the NWL as a critical part of the current Transport for Norwich Strategy and is proceeding with the NWL in parallel with preparation of the GNLPP. This has denied the public the opportunity for commenting on the NWL as part of an integrated land use planning and transport plan.

A paper to the GNPP Board on 10 July 2020 considered a revised timetable to allow a focussed consultation. 'This would include the possibility of including a specific allocation for use of land for the NWL within the GNLPP, supported by a considerable evidence base such as a wider package of transport planning measures to be included in the Transport for Norwich Strategy and consideration of reasonable alternatives'.

Following the Planning White Paper, a paper to the GNDP Board on 30 Sept 2020 concluded that the allocation of the NWL envisaged in July would not be possible: 'However, as in the draft version of the GNLP, the road would still be promoted by policy 4 on implementation and would be delivered through the Transport for Norwich Strategy.' Reference to the NWL in Reg 19 is not 'supported by a considerable evidence base'. The County Council has not published an updated Transport for Norwich Strategy.

Alongside preparation of the local plan, the NWL must be subject to a Habitat Regulations Assessment (HRA) as it would cross the River Wensum SAC. Because the NWL is not allocated in the GNLP, the SA/SEA of the plan is able to conclude that none of the allocated sites coincide with, or are located adjacent to, a European site. (SEA/SA of GNLP Reg 19, Box 8.3).

Also, because the updated Transport for Norwich has not been published, there has been no HRA screening of the NWL as part of the SA/SEA of the Draft LTP4.

There is a wholesale lack of information relating to the NWL and GNLP.

Under the Habitats Directive, development that adversely impacts upon a SAC must demonstrate for planning purposes 'an imperative reason of overriding public interest'. Norfolk County Council has not done this.

The ecological importance of the River Wensum valley in the NWL study area has become more evident. Recently, significant numbers of rare barbastelle bats have been identified by Wild Wings Ecology consultancy in the corridor crossed by the NWL. The findings will add weight to the need for full habitat and species assessments under the EU directive.

Not Justified: Inclusion of the NWL is not appropriate and reasonable alternatives have not been considered. Besides the large adverse environmental impacts of the NWL, Norwich Green Group is also concerned about its land use and transport consequences. The NWL would create a complete third orbital road around Norwich and lead to further car-based urban sprawl and traffic growth. It would increase travel by private car especially between NE Norwich where major housing is located and SW Norwich where there are major employment sites. The report, Trunk Roads and the Generation of Traffic (DoT, 1994) examined as a case study a full length NDR connecting up with the A47 southern bypass to the west and east of Norwich. It concluded that large scale development of land along the NDR corridor would result in "very significant" level of induced traffic on the new road.

Already, Broadland and South Norfolk Councils have located a major Food Hub which is dependent on car and lorry access, on land at Easton overlooking the Wensum valley. Land at Honingham, next door to Easton is flagged up in the GNLP Reg19 as a possible location if a new settlement is required.

Public transport catering for orbital movements is not in place. The NWL is not supported by a package of sustainable transport measures for discouraging traffic growth arising from the road scheme and encouraging modal shift.

The NWL Options consultation considered a large number of individual transport interventions, but it did not put forward comprehensive packages of sustainable transport options.

Not consistent with national policy and the legal target of Net Zero by 2050. The NWL would generate new traffic as shown by the case study in 'Trunk Roads and the Generation of Traffic' and this would increase carbon emissions.

#### Change suggested by respondent:

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**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24505

Object

Utilities, 0360/3053/R10 Policy

**Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]

**Summary:****East Norwich**

We suggest several additions to scope of development for to meet the area's objectively assessed needs:

- 'designed and built to zero carbon standards'
- 'achieve traffic neutrality across the wider road network'
- green open spaces that include an extension to Whitlingham Country Park'

The revised paragraph 335 to read

"The masterplan will promote development of a high density sustainable mixed-use community designed and built to zero carbon standards, coordinate delivery of new transport infrastructure and services and achieve traffic neutrality across the wider road network, enhance green links and green open spaces that include an extension to Whitlingham Country Park, provide for a local energy network, enhance heritage assets, protect Carrow Abbey County Wildlife Site and address local issues including the active railway, the protected minerals railhead and flood risk issues."

We support the creation of a proposed new sustainably built urban quarter in this location. Public consultation on a masterplan has yet to take place and the GNLP policy is the first opportunity for public comment. We consider that the GNLP summary description of the development omits important requirements

GNLP Policy 2 on carbon emission reduction in new development seeks the minimisation of energy demand but it needs to go much further. East Norwich should achieve zero carbon in a number of ways: calculation of Whole Life-Cycle Carbon Assessment; low impact construction; high energy efficiency standards that include optimal levels of thermal insulation, passive ventilation and cooling and passive solar design; production, storage and use of renewable energy on-site. The adopted London Plan (March 2021) sets an exemplar in stating 'major development should be net zero carbon' as part of the Mayor's commitment to London becoming a zero carbon city.

Para 335 refers to 'the delivery of new transport infrastructure and services' network'. We are concerned that Norfolk County Council may propose new or improved external road links for serving East Norwich. When the County Council recently sold Carrow House on King Street to the City Council as part of East Norwich land assembly, the County retained ownership of a 10 metre corridor along its frontage. It leads us to worry that the County Council may consider widening or even dualling of King Street, the oldest road in Norwich leading out of the city, between its junction with Rouen Road and junction with Bracondale. The latter road leads to Martineau Lane roundabout, with roads leading off to Trowse, County Hall and Trowse bypass and it is busy at peak times. Neither would we wish to see a link road across the River Wensum to connect Bracondale/Martineau Lane with Harvey Lane. This idea, in effect the completion of the outer ring road, was proposed as an alternative to the completion of the inner ring road phase 3 in 1992. A road bridge would have a large number of adverse impacts: it would change the quiet suburban character of Thorpe, increase noise and pollution, reduce air quality, threaten marshland biodiversity and water storage capacity, reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas and add extra road capacity and encourage more travel by private car.

The brief for the masterplan includes an emerging development objective, 'promotion of a low car environment'. We agree with the creation of this in order to create an attractive and safe community but we consider that it does not go far enough because it essentially refers to internal travel within the development. We are concerned about the impact of up to 4,000 dwellings on the wider road network. Hence, we propose 'a low car development' with strong measures that encourage car-free living. This would better achieve Net Zero and minimise the impact of East Norwich on the surrounding roads and wider road network.

We propose for investigation, the opening the former rail halt at Trowse for serving East Norwich and County Hall, with bus connections to UEA, the N and N Hospital and Norwich Research Park.

East Norwich would add to pressures on Whitlingham Country Park. The number of visitors has grown, creating conflicts between car-borne visitors and people travelling on foot and by bike along the narrow Whitlingham Lane and increasing pressures on the natural environment. East Norwich provides the opportunity to extend Whitlingham Country Park to cater for to cater for increased demands by incorporating and re-wilding suitable arable land close to the current park boundary.



**Change suggested by respondent:**

Hence, we propose 'a low car development' with strong measures that encourage car-free living. This would better achieve Net Zero and minimise the impact of East Norwich on the surrounding roads and wider road network.

We propose for investigation, the opening the former rail halt at Trowse for serving East Norwich and County Hall, with bus connections to UEA, the N and N Hospital and Norwich Research Park.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

**24506****Object****Policy 0506, 0506 Policy**

**Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]

**Summary:**

We have welcomed the Secretary of State's decision to refuse the recent planning application. Norwich Green Party councillors participated in the call-in inquiry as objectors, alongside many other bodies such as Historic England, Save Britain's Heritage and the Norwich Society and individuals. The scheme attracted a substantial number of objections from Norwich citizens.

Policy GNLP0506 gives the first opportunity for the public to comment on revised uses but without discussion and debate. We consider that Policy GNLP0506 repeats some of the same elements which contributed to a lack of public support for the rejected scheme.

**Change suggested by respondent:**

800 homes

The smaller number of homes (800) marks a change from the earlier figure of 1,250. However, the proposed amended policy has added unquantified student accommodation which did not feature in the 2017 policy brief and would bump up the overall number. We support the principle of student accommodation at Anglia Square. However, the combination of 800 homes plus student accommodation creates an open-ended number of dwellings on this relatively small site of 4.79 ha alongside other major uses. The total could reach 1250 dwellings as before and result in another high rise scheme coming forward. We prefer to see in the region of 800 dwellings as a maximum that includes student accommodation in the total figure and not in addition.

Bullet 1. Lack of recognition of the importance of the local artistic community and their need for facilities as part of the creation of a diverse, integrated community.

Bullet 5: Delete reference to a multi-storey car park

A multi storey car park does not fit with net zero. Low levels of car parking would minimise carbon emissions and traffic impacts such as community severance, free up valuable land, facilitate a better site layout and design and create a safe environment. Anglia Square is one of the most highly sustainable and accessible locations in the city centre

Bullet 6: Lack of ambition for net zero development

The policy reference to 'energy efficient design' is weak. The development should achieve zero carbon in a number of ways: calculation of Whole Life-Cycle Carbon Assessment; low impact construction; high energy efficiency standards that include optimal levels of thermal insulation, passive ventilation and cooling and passive solar design; production, storage and use of renewable energy on-site.

Bullet 6: Remove reference to 'landmark building'

We have strong reservations about the need for a 'landmark' building to act as a focal point for the Northern City Centre given the experience of the failed Anglia Square scheme which resulted in a 20 storey block, designed to mirror the Anglican Cathedral Spire and act as a 'wayfinder'. The view that north city needs a landmark building misinterprets the historic evolution of Norwich over the Water where buildings of significance such as churches and merchant houses were erected. Those buildings that still stand are not landmark buildings akin to the monumental buildings around the market place, but nonetheless they contribute to the historic character of the city and the townscapes in which they stand. Of greater importance is the need to design an attractive, liveable, lively, resilient urban quarter which is sympathetic to its historic surroundings and meets the needs of the local community.

Bullet 7: Add reference to Medieval Street Pattern

Layout and design of the new development should reflect the former medieval street pattern. Norwich's medieval street pattern remains intact apart from the area which was cleared to build Anglia Square. It forms the basis of the city centre conservation area and is a major determinant of the city's historic character.

Bullet 8 Add reference to green open space

As well as high quality landscaping, planting and biodiversity enhancements, a new scheme must include public and private green open space for amenity use, minimise urban overheating and support biodiversity.

Historically, Norwich Over the Water had a semi-rural appearance and areas remained undeveloped until the 20Cth. The green settings of St Augustine's Church and Gildencroft are a reminder of its former character. Anglia Square today is largely devoid of any greenery.

The rejected scheme involved extensive hard structures and landscaping. Roof top podiums provided private outdoor space for residents. Children's play opportunities were 'incidental in the landscape'. The Anglia Square developer expected occupants to use existing limited green open space around the Gildencroft..

The Climate Change Committee recommends an increase in green infrastructure for cooling cities and providing pathways through the urban environment for biodiversity to migrate as the climate changes.

The proposed policy should therefore include extensive green infrastructure improve amenity, reduce the urban heat island effect and enhance biodiversity.

Bullet 13: In addition, redevelopment should create a low car environment and minimise its contribution to traffic on the surrounding road network. Anglia Square is located in a highly accessible location at the heart of the city centre.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx -  
<https://oc2connect.gnlp.org.uk/a/4gj>

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**24491****Object**

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**The Rail Network, 85**

**Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]

**Summary:**

The local rail network around Norwich is limited compared to new rail infrastructure around Cambridge where Cambridge North station has been built to serve major growth close to the city and Cambridge South station is planned. Whilst the GNDP has devised the concept of a Norwich - Cambridge Arc, Norwich is the poor relation in terms of sustainable transport infrastructure.

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx -  
<https://oc2connect.gnlp.org.uk/a/4gj>

24492

Object

**Transport for Norwich and the Transforming Cities Programme, 89****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

89. Transport for Norwich and the Transforming Cities Programme

Transport for Norwich and its predecessor, the Norwich Area Transportation Strategy Implementation Plan (NATS 2013), based around modal shift to bus, walking and cycling, have been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike. Bus service improvements have also been achieved but the Councils are a very long way from delivering an upgraded bus infrastructure plan based on six corridors for the Norwich built up area as promised by the Joint Core Strategy. An application was made to the Transforming Cities Fund for between £74m to £127m for bus infrastructure schemes. Norfolk County Council was awarded £32m and currently, no other sources of funding have been identified.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24494

Object

**Emissions and Climate Change, 94****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Although nitrogen dioxide levels have been falling in the AQMA, breaches continue, notably on Castle Meadow, the main bus corridor.

Particulate matter pollution is an even more serious concern. Fine particulate matter (PM2.5) has been shown to affect every organ in the body. The WHO has set a limit for PM2.5 at 10mcg/m3 whilst recognising that there is no healthy limit. In Norwich, where road traffic is a major pollutant source, a study by Public Health England attributed 5.5% of deaths of people aged 25 and over in 2010 to PM2.5. Although PM2.5 levels have fallen slightly in Norwich, they remain above the WHO limit in the city and just below the WHO limit in suburban and rural parts of Greater Norwich. Electric cars would not avoid the friction of rubber tyres and brakes on road surfaces, a major source of PM2.5.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24495

Object

**Emissions and Climate Change, 95****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Locally per capita CO2 emissions have fallen, largely driven by the fall in emissions from the national power sector. Data on per capita emissions (from transport, domestic dwellings, commercial/industrial settings), collected by the Department of Business, Energy and Environmental Strategy excludes emissions from international aviation, shipping, production and consumption. Consequently, per capita emissions are higher than presented by official figures and radical cuts will be required to achieve Net Carbon Zero.

At the present rate of carbon emissions, the Tyndall Centre for Climate Change Research using Scatter (a carbon footprint tool to reduce city-level emissions) estimates that Norwich will use up its global carbon budget within around seven years.

The City must cut its carbon emissions by 13% every year to meet its contribution to Net Zero. Broadland and South Norfolk with their higher emissions from road transport must make an annual cut of 13% and 14.25% respectively.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24496

Object

**Emissions and Climate Change, 96****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Information should be included on the implications of changes in temperature and precipitation. These include impacts on human, plant and animal health, with implications for food production, water supply, infrastructure, public health and education. The National Trust has mapped the various effects of climate change in England and Wales between 2020 and 2060 and shows major overheating across the whole of the south east and east of England by 2060.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24497

Object

**Flood Risk, 98****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas.

For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24498

Object

**Flood Risk, 99****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas.

For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24499

Object

**Flood Risk, 100****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas.

For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24500

Object

**Flood Risk, 101****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas.

For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24501

Object

**Flood Risk, 102****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas.

For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24502

Object

**Landscape, 117****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

We strongly endorse CPRE's case made for a Green Belt for Norwich based on a Green Wedges principle.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>



24507

Object

**CC8, CC8 Policy****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Policy CC8 - King Street Stores, Norwich (approx. 0.21 ha), allocated for residential use

The number of homes should be compatible with retention of the industrial heritage buildings and the existing mature trees.

Current policies prioritise reinstatement of King Street's historic street and building right up to the highway. While we consider this appropriate at the northern, city end of King Street, it is no longer appropriate for the area covered by policy CC8, particularly as a number of mature trees now line the boundary between the site and the highway. It would be beneficial to keep these trees and to develop housing around them, in a careful manner which does not damage them. These mature trees are important as they help battle flooding, urban heating, climate change and biodiversity loss. The retention of these trees and the boundary wall outweighs the reinstatement of the street frontage. As the trees have matured over the last few years since policy decisions about this site were made, they are now of greater value and so policies affecting this site should be revised if they are to remain sound.

**Change suggested by respondent:**

Furthermore, we would like to see the retention of the warehouse buildings on this site, preferring to see them renovated and re-used, most likely for accommodation, rather than demolished. River access and the further retention and promotion of biodiversity also need to be considered as part of the site development.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

24508

Object

**R13, R13 Policy****Respondent:** Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]**Summary:**

Given the acknowledged constraints of the site, the steep hill and surrounding woodland, and the risks to properties above from undermining the hill on which they stand, we advocate keeping the area as woodland. This would support biodiversity and climate objectives and remove a risk to the Thorpe Ridge Conservation area

**Change suggested by respondent:**

Given the acknowledged constraints of the site, the steep hill and surrounding woodland, and the risks to properties above from undermining the hill on which they stand, we advocate keeping the area as woodland. This would support biodiversity and climate objectives and remove a risk to the Thorpe Ridge Conservation area

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** GNLP Reg 19 Norwich Green Party Responses March 2021V3.docx - <https://oc2connect.gnlp.org.uk/a/4gj>

23701

Support

**R2, R2 Policy****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners**Summary:**

Norfolk County Council, as landowner, supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable and deliverable for development in the earlier part of the plan period.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** Transport Note - South Walsham allocations - <https://oc2connect.gnlp.org.uk/a/4wv>

23702

Support

**Policy 0382, 0382 Policy****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners

**Summary:**

The landowner supports the overarching growth objective of the GNL, which is to provide choice and flexibility by ensuring there are enough committed sites for new homes.

The landowner supports the allocation and inclusion of policy GNL0382 in the GNL. The landowner and their development company (Repton Property Developments Ltd.) are now looking to deliver GNL0382 in conjunction with SWA1 situated to the north, in a comprehensive and coherent manner (as envisaged by the Regulation 19 version of the plan). SWA1 has been subject to a planning permission (ref: 20161643) which demonstrates that site is capable of delivering at least 21 dwellings.

Repton is in the process of appointing a consultant team to progress a planning application for GNL0382 and SWA1 collectively, with pre-application discussions likely to take place with Broadland Council in the spring of 2021. A draft Statement of Common Ground (SocG) is submitted with this representation, which demonstrates that the site is available, suitable, and deliverable.

It has been demonstrated through 20161643 that access to the site can be achieved from Burlingham Road. Whilst both policies GNL0382 and SWA1 envisage access from Burlingham Road, when read together, there is an opportunity to consider access to the overall combined site from Chamery Hall Lane to the south. As such, the policy wording of GNL0382 should be flexibly worded to allow for this to be considered.

Technical work undertaken by Repton's Highways Consultants is appended to this representation (See Appendix on separate sheet). This identifies a possible access solution from Chamery Hall Lane, to GNL0382. Consideration has been made to achieving appropriate visibility splays within the control of the landowner. As shown on the access drawing, visibility of approximately 160m can be provided, which accords with 85th percentile speeds of 53mph.

Whilst it is noted that the speed limit on Chamery Hall Lane is de-restricted (i.e. 60mph), a speed survey recently undertaken by the highways consultants, demonstrates that the 85th percentile speeds recorded were lower than the 60mph speed limit (namely they were 51/52mph, which is less than the 53mph for which visibility splays of 160m are provided for on the access drawing). In addition, a 4.8m wide access road can be achieved with radii of 6m. There is flexibility to enlarge this if required. Also taken into consideration is junction spacing with Burlingham Road and the existing layby on Chamery Hall Lane, to the west. The layby is on land within the control of the landowner and can be stopped up or relocated to the west. As such there is considered to be an acceptable access solution to GNL0382 to be further explored with the Highway Authority.

In summary, policy GNL0382 is considered to be sound but flexibility within this policy (and also policy SWA1) should be introduced to provide access from either Burlingham Road to the north, or Chamery Hall Lane from the south, as supported by a robust approach to the comprehensive masterplanning of the site.

**Change suggested by respondent:**

Flexibility within Policy SWA1 (and GNL0382) should be given to provide access from either Burlingham Road to the north, or Chamery Hall Lane from the south, as part of a robust approach to the comprehensive masterplanning of the site.

To achieve this, the policy should be re-worded as follows

Policy GNL0382: Land north of Chamery Hall Lane, South Walsham

Land north of Chamery Hall Lane, South Walsham (approx. 1.12ha) is allocated for residential development. The site is likely to accommodate approximately 25 homes.

More homes may be accommodated, subject to an acceptable design and layout as well as infrastructure constraints. The development will be expected to address the following specific matters:

1. Single vehicular access to serve GNL0378 and SWA1 from either Burlingham Road to the north or Chamery Hall Lane from the south (with pedestrian and cycle access onto Burlingham Road through the existing SWA1 allocation) with a masterplan provided to ensure a cohesive development with that site.

2. Provision of adequate footpath improvements to ensure a safe and continuous pedestrian route between the development and the school, which may involve improvements to junctions throughout the village.

Whilst Norfolk County Council, as landowner, supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable and deliverable for development in the earlier part of the plan period, it would reserve the right to appear at the Examination, if necessary, to outline further the benefit of the suggested change to the wording of the policy.

Transport Note – Chameryhall Lane, South Walsham

This note has been prepared by Rossi Long Consulting (RLC) for Repton Property Developments Ltd. to summarise the work undertaken to date regarding the provision of suitable access to land north of Chameryhall Lane, South Walsham. It is understood that the site has previously been considered by the HELAA Assessment as suitable for up to 30 dwellings, with preferred access taken from Burlingham Road to the north-east of the site.

We also understand that the site is a preferred allocation in the emerging Reg. 19 Greater Norwich Local Plan which proposes to allocate the site for at least 25 dwellings. Attached to this note is a site access drawing prepared by RLC to investigate the feasibility of potential access from the site on to Chameryhall Lane to the south.

Consideration has been made to achieving appropriate visibility splays within client owned land.

As shown on the aforementioned drawing, visibility of approximately 160m can be provided, which accords with 85th percentile speeds of 53mph.

Whilst it is appreciated that the speed limit on Chameryhall Lane is de-restricted (i.e. 60mph), a speed survey recently undertaken suitably demonstrates that the 85th percentile speeds recorded were lower than the 60mph speed limit. Infact vehicular speeds were 51/52mph, which is less than the 53mph for which visibility splays of 160m were provided for on the attached drawing; therefore, the visibility splays can be considered appropriate for this location.

As can also be seen by the attached drawing, a 4.8m wide access road is shown to be provided with radii of 6m. These can be enlarged should NCC Highways require or housing numbers increase.

Also taken into consideration is junction spacing with Burlingham Road and the existing layby on Chameryhall Lane to the west. In summary, the layby will likely either have to be stopped up or relocated to the west. It is understood that NCC own the field to the north and west of Chameryhall Lane, so there should be no third-party land required should the layby have to be relocated.

It is also anticipated that pedestrian access will be required at some stage to Burlingham Road. This could be provided via a small strip of land shown on the Architect's drawing to the north-east of the site, or possibly by the public highway on Burlingham Road.

Whilst there is a short gap in footway provision from Chameryhall Lane to Burlingham Road, the carriageway is one-way at this point which should permit a reduction in carriageway width to provide the required footway.

Therefore, the work undertaken as set out above demonstrates that an access can be provided to GNLPO382 that can serve this site and land within allocated policy SWA1 (land to the north of GNLPO382).

The recommended next steps are to undertake further discussions with the Local Highway Authority, Norfolk County Council to consider an appropriate solution.

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Transport Note - South Walsham allocations - <https://oc2connect.gnlp.org.uk/a/4wv>

23705

Object

**Blofield, Settlement Map****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Summary:**

The Blofield settlement boundary, as drafted at Regulation 19 stage, fails to properly reflect the key service centre designation of the village by excluding recent and planned development (notably in the northern part of the village including current proposals that will concentrate new development and enhanced facilities in the area east of Plantation Road) from the settlement boundary shown on the Blofield Map.

Norfolk County Council own two parcels of land east of Plantation Road, one located to the north of the current surgery building (an area of 0.55 ha site) and a second area to the east of the surgery car park (an area of 1.0ha).

Both areas are required for development in the next three years. The western portion (0.55ha) is required to provide an access road to serve an enlarged surgery / health care facility for the village (planning application ref. 2021/0252) which has NHS funding to expand the medical facilities to meet local need. Work is planned to start to construct the road and surgery expansion in mid-2021. This road will also play a key role as the access to a planned replacement Primary School that is required in the village to replace the existing school (which has been identified as inadequate to serve the needs of the area). This will be constructed on the 1.0 ha parcel owned by Norfolk County Council (as part of a larger area to accommodate the school). At this stage a planning application to seek approval for this replacement school is planned in late 2021 with an ambition to open the replacement school in September 2023.

As the area east of Plantation Road has clearly defined boundaries with Plantation Road as the western boundary, the A47 embankment to the north and the replacement school having fixed northern and eastern boundaries, this will not create a breakout into the open countryside. This could also offer an opportunity for small number of dwellings north of the access road that will serve the replacement Primary School, in a location where the principle of housing has already been established (by the grant of outline planning permission for a mix of house and bungalows under planning application ref. 20121420 in May 2014 and under planning application ref. 20141044 in September 2014). The area north of the access road would offers an opportunity for high quality / specialist housing (which could include a very high environmental standards / or managed self build / or to meet local need). Furthermore, a small number of dwellings would not change the character, would not materially increase pressure on services in the village and would be conveniently related to services and facilities, not only the enlarged surgery, and replacement primary school, but also shops, bus stops, and other amenities.

In preparing the settlement boundary for Blofield, there are other inconsistencies where the built-up area is excluded from the settlement boundary. For the northern part of the village this should be addressed, as illustrated in the accompanying plan, including where housing development has taken place but is shown as excluded from the settlement boundary, including at Farman Way.

In summary, the recent and planned development has and will reinforce the role of the village and notably will introduce a more developed character to the area east of Plantation Road. Therefore, the settlement boundary should be revised in this area (and elsewhere in the village) to reflect this recent and planned development (reflecting the role of Blofield plays as a key service centre). This is particularly important and relevant for the area east of Plantation Road as there is no alternative location for the expanded medical facilities, replacement primary school and access road to serve these two developments.

**Change suggested by respondent:**

It is considered that the change to the settlement boundary should be made, as illustrated in the attached plan, for the reasons outlined in question 5.

**Legally** Yes  
**compliant:**  
**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Map - <https://oc2connect.gnlp.org.uk/a/45p>

## 23699

## Support

### Policy 0380, 0380 Policy

**Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]

**Petition:** 2 petitioners

#### Summary:

Norfolk County Council, as landowner, supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable and deliverable for development in the earlier part of the plan period.

#### Change suggested by respondent:

-

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** Transport Note - South Walsham allocations - <https://oc2connect.gnlp.org.uk/a/4wv>

## 23700

## Support

### Policy 4016, 4016 Policy

**Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]

**Petition:** 2 petitioners

#### Summary:

Norfolk County Council, as landowner, supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable and deliverable for development in the earlier part of the plan period.

#### Change suggested by respondent:

-

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** Transport Note - South Walsham allocations - <https://oc2connect.gnlp.org.uk/a/4wv>

## 23703

## Support

### Policy SWA1, SWA1 Policy

**Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]

**Petition:** 2 petitioners

**Summary:**

The landowner supports the overarching growth objective of the local plan, which is to provide choice and flexibility by ensuring there are enough committed sites for new homes.

The landowner supports the retention of the site in the GNLP. The site has been subject to a recent planning permission (ref: 20161643) which clearly justifies the allocation of the site. It has been demonstrated through this planning permission, that the site is capable of delivering at least 21 dwellings.

The landowner and their development company (Repton Property Developments Ltd.) are now looking to deliver SWA1 in conjunction with GNLP0382 situated to the south, in a comprehensive and coherent manner (as envisaged by the Regulation 19 version of the GNLP).

Repton is in the process of appointing a consultant team to progress a planning application for SWA1 and GNLP0382 collectively, with pre-application discussions likely to take place with Broadland Council in the spring of 2021.

It has been demonstrated through 20161643 that access to the site can be achieved from Burlingham Road. When read together with GNLP0382, there is an opportunity to consider access to the overall combined site, from Chamery Hall Lane to the south. As such, the policy wording of SWA1 should be flexibly worded to allow for this to be considered.

Technical work undertaken by Repton's Highways Consultants is appended to this representation (See Appendix on separate sheet). This identifies a possible access solution from Chamery Hall Lane, to GNLP0382. Consideration has been made to achieving appropriate visibility splays within the control of the landowner. As shown on the access drawing, visibility of approximately 160m can be provided, which accords with 85th percentile speeds of 53mph.

Whilst it is noted that the speed limit on Chamery Hall Lane is de-restricted (i.e. 60mph), a speed survey recently undertaken by the highways consultants, demonstrates that the 85th percentile speeds recorded were lower than the 60mph speed limit (namely they were 51/52mph, which is less than the 53mph for which visibility splays of 160m are provided for on the access drawing). In addition, a 4.8m wide access road can be achieved with radii of 6m. There is flexibility to enlarge this if required. Also taken into consideration is junction spacing with Burlingham Road and the existing layby on Chamery Hall Lane to the west. The layby is on land within the control of the landowner and can be stopped up or relocated to the west. As such there is considered to be an acceptable access solution to GNLP0382, from Chamery Hall Lane, to be further explored with the Highways Authority.

In summary, policy SWA1 is considered to be sound but flexibility within this policy (and also policy GNLP) should be introduced to provide access from either Burlingham Road to the north, or Chamery Hall Lane from the south, as supported by a robust approach to the comprehensive masterplanning of the site.

**Change suggested by respondent:**

Flexibility within Policy SWA1 (and GNLP0382) should be given to provide access from either Burlingham Road to the north, or Chamery Hall Lane from the south, as part of a robust approach to the comprehensive masterplanning of the site.

Policy SWA1: Land to the rear of Burlingham Road/St Marys Close, South Walsham

Land to the rear of Burlingham Road/St Marys Close, South Walsham (of approx. 0.68ha) is allocated for residential development. This will accommodate at least 20 homes.

More homes may be accommodated, subject to an acceptable design and layout being achieved.

The development will be expected to address the following specific matters:

1. Single vehicular access to serve GNLP0378 and SWA1 from either Burlingham Road to the north or Chamery Hall Lane from the south (with pedestrian and cycle access onto Burlingham Road through the existing SWA1 allocation), with a masterplan provided to ensure a cohesive development with that site.
2. A sustainable drainage system (SUDS) should be provided. If this is not possible then restricted discharge to watercourse or surface water sewer may be required.
3. Compensatory provision for the loss of recreational space may be required.

## Transport Note – Chameryhall Lane, South Walsham

This note has been prepared by Rossi Long Consulting (RLC) for Repton Property Developments Ltd. to summarise the work undertaken to date regarding the provision of suitable access to land north of Chameryhall Lane, South Walsham.

It is understood that the site has previously been considered by the HELAA Assessment as suitable for up to 30 dwellings, with preferred access taken from Burlingham Road to the north-east of the site.

We also understand that the site is a preferred allocation in the emerging Reg. 19 Greater Norwich Local Plan which proposes to allocate the site for at least 25 dwellings. Attached to this note is a site access drawing prepared by RLC to investigate the feasibility of potential access from the site on to Chameryhall Lane to the south.

Consideration has been made to achieving appropriate visibility splays within client owned land.

As shown on the aforementioned drawing, visibility of approximately 160m can be provided, which accords with 85th percentile speeds of 53mph.

Whilst it is appreciated that the speed limit on Chameryhall Lane is de-restricted (i.e. 60mph), a speed survey recently undertaken suitably demonstrates that the 85th percentile speeds recorded were lower than the 60mph speed limit.

In fact vehicular speeds were 51/52mph, which is less than the 53mph for which visibility splays of 160m were provided for on the attached drawing; therefore, the visibility splays can be considered appropriate for this location.

As can also be seen by the attached drawing, a 4.8m wide access road is shown to be provided with radii of 6m. These can be enlarged should NCC Highways require or housing numbers increase.

Also taken into consideration is junction spacing with Burlingham Road and the existing layby on Chameryhall Lane to the west. In summary, the layby will likely either have to be stopped up or relocated to the west. It is understood that NCC own the field to the north and west of Chameryhall Lane, so there should be no third-party land required should the layby have to be relocated.

It is also anticipated that pedestrian access will be required at some stage to Burlingham Road. This could be provided via a small strip of land shown on the Architect's drawing to the north-east of the site, or possibly by the public highway on Burlingham Road.

Whilst there is a short gap in footway provision from Chameryhall Lane to Burlingham Road, the carriageway is one-way at this point which should permit a reduction in carriageway width to provide the required footway.

Therefore, the work undertaken as set out above demonstrates that an access can be provided to GNLP0382 that can serve this site and land within allocated policy SWA1 (land to the north of GNLP0382).

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Transport Note - South Walsham allocations - <https://oc2connect.gnlp.org.uk/a/4wv>



23927

Support

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Summary:**

Norfolk Constabulary support multi-functional green infrastructure plans. The safe access and movement of people through green infra structure in particular is desired and where relevant Norfolk Police would request the adoption of CEPTED (Crime Prevention Through Environmental Design) based on the principles of the police initiative Secure By Design (SBD) to facilitate this. Crime prevention 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. Central Government place great emphasis on the role of the Police within planning consultations, furthermore National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF).

Further provisions that focus on these issues would be welcome to ensure conformity with the NPPF and secure soundness to the Plan

**Change suggested by respondent:**

In policy 3 and / or its supporting text, further provisions that focus on CEPTED (Crime Prevention Through Environmental Design) based on the principles of the police initiative (SBD) Secure By Design would be welcome.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23928

Object

**Policy 0337R, 0337R Policy****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners**Summary:**

Policy GNLP0337 will provide a very large urban extension at the edge of north west Norwich. The allocation extends to 78.36 ha for residential development (to accommodate at least 1,400 homes) associated public open space, new primary school and local medical centre. To ensure that there is the necessary police infra-structure to cater for the existing community and proposed growth, a new police facility is required and should be embedded in this allocation to replace the current facility on Drayton Road. Within allocation GNLP0337, in addition to the need to safeguard land for a new primary school and local medical centre, the policy should also include a new police station. On a site of this size, such provision for a site would not prejudice the delivery of the other elements of the policy.

**Change suggested by respondent:**

The policy should be revised as follows (to add police station provision within its text)

POLICY GNLP0337 Land between Fir Covert Road and Reepham Road, Taverham (81.69ha) is allocated for residential development. The site will accommodate at least 1,400 homes including specialist care housing and older persons housing units, associated public open space, local centre, primary school, police station and local medical centre.

More homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints.

The development will be expected to address the following specific matters:

1. Preparation of a masterplan to guide the development, submitted as part of the application for planning permission.
2. Provision of on-site recreation to encourage healthy lifestyles, in accordance with relevant policies.
3. 2ha safeguarded for provision of primary school.
4. Land safeguarded for provision of medical care facility.
5. A local centre at the heart of the development, easily accessible to surrounding residential areas
6. Land safeguarded for provision of police station....

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23933

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners**Summary:**

This appendix provides additional detail to support policy 4 of this plan (a separate representation has been submitted regarding Policy 4). The Appendix sets out infrastructure requirements to serve growth including those identified in the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR).

Norfolk Constabulary recognise the importance of providing robust and fully justified evidence to support the infrastructure requirements. Norfolk Constabulary are submitting a Police Infrastructure Delivery Paper which will detail the infrastructure needs of the police.

The Regulation 18 version recognised these needs were important and therefore the provisions in the Police Infrastructure Delivery Paper should be included and the requirements of the Police recognised in the Policy 4 and Appendix 1 so that funding is secured for the necessary police infrastructure to cater for the planned growth and ensure the delivery of inclusive, resilient and safe communities.

**Change suggested by respondent:**

The summary of police infrastructure requirements should be included in Appendix 1 (with its associated cross reference to Policy 4).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23929

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners

**Summary:**

The importance and priority to wider strategic infrastructure in the GNLP area is welcomed.

Norfolk Constabulary have significant pressure on resources because of new development and need to ensure that its strategic infrastructure reflects the increased pressure on their resources as a result on growth. Whilst a new strategic site has been identified east of Norwich to address pressures in this part of the Plan area, further pressure has been identified in north / north west Norwich. Therefore, there is a need to provide a new dedicated station / facilities to serve this area, to ensure that the clear aspirations of Policy 2 are met, to ensure the delivery of inclusive, resilient and safe communities.

A key element of police infra-structure required to serve the Greater Norwich area is a new response facility to serve north Norwich (and the associated growth which will come forward to 2038 and beyond). It is essential to meet operational needs that this is provided close to the NDR, north of Norwich, to deliver response policing, plus foster a safe and secure environment and quality of life (and limit crime and disorder and the fear of crime).

This would address the strategic needs of Norfolk Constabulary. Furthermore, this would complement the approach adopted by Norfolk Constabulary, when working with communities on Neighbourhood Plans, where the inclusion of clear reference to the use of developer contributions and / or CIL monies to deliver local initiatives that create safer communities (and reduce crime) is encouraged.

It is therefore essential that the requirements of Norfolk Constabulary are included within the strategic infrastructure element of policy 4 (mirroring the priority given to health requirements). Therefore, the policy should be revised to read as follows

**Change suggested by respondent:**

The policy should be revised to add reference to police infrastructure and read as follows

The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to:

- The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to off-set the need for reinforcement;
- Water supply and sewerage network improvements including the waste-water network at Whitlingham water recycling centre, the Yare Valley sewer and elsewhere to protect water quality and designated habitats;
- Police Infrastructure
- Health care infrastructure.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23930

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners**Summary:**

Norfolk Constabulary have the responsibility for policing making Norfolk a safe place where people want to live, work, travel and invest in.

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

'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which ...

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'....

Therefore the inclusion within criteria 1, 6 and 7 of the importance of creating safe, inclusive, resilient communities is welcomed.

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.

**Change suggested by respondent:**

In policy 2, criteria (i) of this policy should include reference to the specific objective 'to create and maintain a safer community and reduce crime and disorder'.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

23934

Object

**Appendices, Appendix 1 Infrastructure Requirements****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners**Summary:**

This appendix provides additional detail to support policy 4 of this plan (a separate representation has been submitted regarding Policy 4). The Appendix sets out infrastructure requirements to serve growth including those identified in the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR).

Norfolk Constabulary recognise the importance of providing robust and fully justified evidence to support the infrastructure requirements. Norfolk Constabulary are submitting a Police Infrastructure Delivery Paper which will detail the infrastructure needs of the police.

The Regulation 18 version recognised these needs were important and therefore the provisions in the Police Infrastructure Delivery Paper should be included and the requirements of the Police recognised in the Policy 4 and Appendix 1 so that funding is secured for the necessary police infrastructure to cater for the planned growth and ensure the delivery of inclusive, resilient and safe communities.

**Change suggested by respondent:**

The summary of police infrastructure requirements should be included in Appendix 1 (with its associated cross reference to Policy 4).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23931

Support

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners**Summary:**

Norfolk Constabulary support the proposed Table 8 - Key issues addressed by Policy 2 (Issue 7) for the establishment and maintenance of resilient, safe and inclusive communities and also (Issue 1) to provide convenient, safe and sustainable access to facilities.

Norfolk Constabulary would support Local Plan policy and text that included reference to the principles of Secure By Design (SBD) (the police initiative which promotes the adoption of crime prevention measures) to improve the security of buildings and their immediate surroundings to provide safe places to live, as in line with Government directive . Both the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) set out guidance in creating safe and accessible communities and attention is highlighted to section 8 of the NPPF. This recommends that local planning authorities ensure their policies and decisions aim to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion (paragraph 91). NPPF paragraph 164 advises that when preparing their Local Plan, local authorities should work with local advisors and others to ensure that they have taken 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. The Design section of the PPG includes crime prevention and security measures.

Further provisions that focus on these issues would be welcome to ensure conformity with the NPPF and secure soundness to the Plan.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23932

Object

**Delivery, Delivery Statement****Respondent:** NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]**Petition:** 2 petitioners

**Summary:**

Norfolk Constabulary have the responsibility for policing, making Norfolk a safe place where people want to live, work, travel and invest in.

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

'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which ...

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'...

A key to providing sustainable communities that are safe and accessible so that crime and disorder do not undermine community cohesion (and quality of life) is to ensure that the necessary police infra-structure is available to serve existing and new communities, where new development places additional pressures on Police.

Based on the clear national planning policy advice (and to ensure consistency with Local Plan Policy 2), it is considered that within the Infra-structure element of the Delivery Statement, specific reference should be made to Norfolk Constabulary and its wording should be revised to read as detailed in question 6 below

**Change suggested by respondent:**

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 Constabulary and local health care providers. Infrastructure will be delivered through: .....

Para 143 should add reference to police and read as follows:

Existing schools, police and health facilities will be expanded, and new facilities provided to serve growing communities, with greater use of technology to access some types of health care.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



23697

Object

**Aylsham, Settlement Map****Respondent:** Deborah van Oosterom [19937]**Summary:**

Last year I looked very carefully at the Reg 18 consultation documents proposing a plan for 300 new homes in Aylsham. I commented then that while I fully appreciated the need for more housing it was vitally important that this should meet reasonable criteria of good quality and design, and be supported with appropriate infrastructure, in order to give its inhabitants a decent quality of life while being happily and successfully assimilated into the existing town, and with due respect for the environment. On this basis - and only on this basis - it seemed reasonable to agree a plan for 300 new houses.

(Unfortunately much of the new housing built recently around Aylsham does not inspire confidence that these criteria are a priority for developers and planners.)

Now, with no further consultation, you are sweeping in with a proposed change to this plan, which adds another site and nearly doubles the number of houses. There seems to have been no proper consideration or appreciation of the impact of this on the town, or on the environment.

I would like to add my voice to those, including the Town Council, who find the new stage of the plan to be neither legal, nor sound, nor justified. The reasons for this are itemised in the Town Council's response.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24155

Object

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**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 1

**Change suggested by respondent:**

SEE ENCLOSED NOTE 1

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24156

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 2

**Change suggested by respondent:**

SEE ENCLOSED NOTE 2

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24157

Object

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**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 3

**Change suggested by respondent:**

SEE ENCLOSED NOTE 3

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24158

Object

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**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 4

**Change suggested by respondent:**

SEE ENCLOSED NOTE 4

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24159

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 5

**Change suggested by respondent:**

SEE ENCLOSED NOTE 5

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24160

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 6

**Change suggested by respondent:**

SEE ENCLOSED NOTE 6

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24161

Object

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**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 7

**Change suggested by respondent:**

SEE ENCLOSED NOTE 7

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>



24162

Object

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**Long Stratton, Settlement Map****Respondent:** Orbit Homes [10994]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

SEE ENCLOSED NOTE 8

**Change suggested by respondent:**

SEE ENCLOSED NOTE 8

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** L0003 - GNLP Reps Cover Letter - Orbit Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vv>  
Enclosure 8. Part 2 - Sites Plan - Long Stratton.pdf - <https://oc2connect.gnlp.org.uk/a/4vb>  
Enclosure 7. Policy 7.4 - Village Clusters.pdf - <https://oc2connect.gnlp.org.uk/a/4vc>  
Enclosure 6. Policy 7.2 - The Main Towns.pdf - <https://oc2connect.gnlp.org.uk/a/4vd>  
Enclosure 5. Policy 5 - Homes.pdf - <https://oc2connect.gnlp.org.uk/a/4vw>  
Enclosure 4. Policy 4 - Strategic Infrastructure.pdf - <https://oc2connect.gnlp.org.uk/a/4vf>  
Enclosure 3. Policy 3 - Environmental Protection and Enhancement.pdf -  
<https://oc2connect.gnlp.org.uk/a/4vg>  
Enclosure 2. Policy 2 - Sustainable Communities.pdf - <https://oc2connect.gnlp.org.uk/a/4vh>  
Enclosure 1. Policy 1 - Growth Strategy.pdf - <https://oc2connect.gnlp.org.uk/a/4vx>

24455

Object

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**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

it would be helpful if further clarity could be provided in the submission version of the Plan on the following:

Given that the background evidence advocates a site-specific approach to calculating and delivering BNG, it is unclear how the policy requirement for at least 10% gain can be justified. District wide policy of £205 differs from evidence base figure. SEE FULL REP ATTACHED.

**Change suggested by respondent:**

Policy 3 should be adjusted to allow ability to deliver on-site mitigation as an alternative to per dwelling contributions. SEE FULL REP ATTACHED.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24456

Object

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**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

The evolution of the GNLP – and the selection of development sites - has not 'considered transport from the earliest stages of plan-making', particularly in respect of the choices around the location of new growth which can limit the need to travel or providing a genuine choice of sustainable transport options.

SEE FULL REP ATTACHED

**Change suggested by respondent:**

Rectify the disconnect between sustainable transport and spatial growth planning, by engaging with the County Council and other statutory transport providers to align priorities.

SEE FULL REP ATTACHED

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24457

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

GNLP evidence base does not include any housing needs assessment, or equivalent, nor is there any record of the self-build and custom housebuilding register for the GNLP area to align the 5% requirement with the underlying demand evidence.

SEE FULL REP ATTACHED

**Change suggested by respondent:**

Include housing needs assessment and register for self build housing. Amend viability assessment to take account of 5% policy requirement for self build. SEE FULL REP ATTACHED.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24458

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

Policy 6 fails to capitalise on the opportunity to further support and direct employment growth to the Cambridge-Norwich Tech Corridor.

SEE FULL REP ATTACHED.

**Change suggested by respondent:**

Include CNTC in Policy 6. SEE FULL REP ATTACHED

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24459

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Orbit Homes [10994]

**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]

### Summary:

Over-emphasis on the Norwich area poses a risk to the overall deliverability and soundness of the plan.

SEE FULL REP ATTACHED

### Change suggested by respondent:

Rather than allocate contingency sites the GNDDP could put in place a supportive policy framework to favourably consider a new settlement allocation during the first part of the plan period.

SEE FULL REP ATTACHED.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24460

Support

## Policy 7.2 The Main Towns, Policy 7.2 The Main Towns

**Respondent:** Orbit Homes [10994]

**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]

### Summary:

We support the policy as currently drafted. SEE FULL REP ATTACHED.

### Change suggested by respondent:

The critical mass of a new settlement closely related to a town can deliver the appropriate levels of infrastructure.

SEE FULL REP ATTACHED.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24451

Object

**The GNLP and other local plan documents, 22****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

We note that the GNLP will not replace the existing adopted Area Action Plans and that following the adoption of the Reg 19 plan, there will be a large number of separate yet overlapping DPDs making up the statutory development plan for the area.

Having both policy and allocations set out in a number of separate documents (with different plan periods and dates of adoption) is not unusual. However, it can cause complexities for stakeholders in assessing and coming to an informed view about the overall sustainability and environmental impact of the 'plan' in its entirety if sites are being allocated in a number of plans concurrently

but not being assessed in terms of their total impact.

This is something that any Inspector may need to come to a view on through the Examination into the Reg 19 Plan and its accompanying SA. However, in the interim, it would be useful to aid understanding and provide clarity if Appendix 4 of the GNLP was expanded to provide a matrix/ 'progress' table of:

(a) the policies and allocations already adopted and what sites and developments are already committed under these policies.

(b) the development to be delivered under the other DPDs yet to be produced/Examined.

(c) what policies/sites are yet to be implemented through the AAPs.

In order to ensure that the full impact of the Reg 19 plan has been robustly assessed, we would welcome clarity from the GNDP as to how the cumulative SA testing of these plans with the Reg 19 plan has been undertaken.

3.9 Similarly, it may be worth setting out in both the plan and the Local Development Scheme (LDS) how the new settlement assessment process currently identified in paragraph 401 of the GNLP dovetails with the timescales for the various DPD adoptions (most notably, the South Norfolk Village Clusters document).

SEE FULL REP ATTACHED

**Change suggested by respondent:**

Include progress table at Appendix 4 and expand LDS

SEE FULL REP ATTACHED

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24462

Object

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**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

Whilst we support the principle and intent of Policy 7.6, we have a number of concerns over the brevity of the Policy wording and supporting text as currently drafted.

SEE FULL REP ATTACHED.

**Change suggested by respondent:**

The policy would benefit from some additional policy wording and alterations in the interest of providing further support and direction.

SEE FULL REP ATTACHED

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24452

Object

### Section 3 - The Vision and Objectives for Greater Norwich, 123

**Respondent:** Orbit Homes [10994]

**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]

**Summary:**

We support the overall principles and statements of intent set out in section 3. However, we consider that as it stands, there is a 'disconnect' between these statements of intent and the way in which the Plan proposes these are to be delivered through the identification and allocation of locations/sites for new growth to 2038.

Most notably, we are concerned that the GNLP decisions around the scale and nature of new growth reflected in the currently proposed allocations do not support the Council's objectives. A new settlement or garden village model has the ability to achieve the change from 'edge of settlement piecemeal growth' (that currently in the plan to 2038), to a net zero carbon emission development (the optimal way to deliver on the Council's objectives and targets); continuing the focus on 'edge growth' to 2038 will not.

SEE FULL REP ATTACHED

**Change suggested by respondent:**

In order to have a plan which is effective in its ability to deliver on its objectives – and therefore be found sound - we suggest that a number of adjustments could be made to the Reg 19 Plan:

1. More emphasis on the Cambridge-Norwich Tech Corridor as a spatial influence and driver of sustainable growth and alignment with the GNLP spatial locations for growth
2. Strengthening the GNLP policy framework to ensure a move to more sustainable transport modes and climate-resilient growth.
3. More Proactive Planning for a New Settlement

SEE ATTACHMENT FOR FULL SUGGESTIONS INCLUDING TO WORDING OF PLAN

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>



24515

Object

**Site Assessment Booklets and Studies, Housing and Economic Land Availability Assessment (HELAA)****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

An inconsistent approach has been adopted with regard to the assessment of new settlement sites. SEE FULL REP IN ATTACHMENT.

**Change suggested by respondent:**

Revise scores in HELAA for SGV.  
SEE FULL REP IN ATTACHMENT.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24453

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

We support the GNL P's ambition to address climate change and shift to a post-carbon economy. We do, however, strongly believe that aligning growth spatially with committed strategic infrastructure improvements and delivering holistically planned growth by way of a new settlement presents the best opportunity to achieve these ambitions both within the current plan period and beyond as opposed to the range of sites of varying sizes that do not present a coherent approach to addressing the ambition of a net zero carbon emissions growth plan.

SEE FULL REP ATTACHED

**Change suggested by respondent:**

Include criteria-based policy governing new settlement, SEE FULL REP ATTACHED

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24516

Object

**Site Assessment Booklets and Studies, Sustainability Appraisal Report****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

The SA incorrectly assesses the SGV (Site Reference: GNLP4057A) against some of the sustainability objectives and the SA could benefit from an expanded assessment of the new settlement proposals which is outlined in the attachment. SEE FULL REP IN ATTACHMENT.

**Change suggested by respondent:**

The SA should be revised regarding certain objectives for SGV proposal. SEE FULL REP IN ATTACHMENT.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24454

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

Whilst we support the thrust of Policy 1 and its supporting text, we consider that the amendments to Policy 1 proposed in the Reg 19 plan fail to address a number of key issues:

- (a) Ensuring housing need is fully aligned with economic growth ambitions;
- (b) Properly embedding the commitment expressed in Policy 7.6 to a new settlement for accommodating higher housing needs arising within the current plan period (this should specifically be referenced under the Housing text of Policy 1);
- and
- (c) Failing to provide sufficient certainty and clarity by identifying within Policy 1 and the Key Diagram a preferred spatial growth area within which any new settlement could come forward.

SEE FULL REP ATTACHED

**Change suggested by respondent:**

Prepare a robust Housing and Economic Needs Assessment to comply with national guidance and clarify the number of homes likely to be needed in Greater Norwich where this appears likely to exceed the outcome of the standard method.

Policy 1 would benefit from the inclusion of a para under the Settlement Hierarchy to reference the commitment to a new settlement to meet additional housing needs within the Plan period.

Expanding Policy 1 to include within its spatial strategy more specificity about what a 'sustainable community' might constitute at a strategic scale would be helpful in guiding decisions about the criteria for new settlements, decisions for which will need to be taken in the next 2 years if the Councils delivery programme is to be met.

SEE FULL REP ATTACHED

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>

Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>

Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>

Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24552

Support

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

We have no objection to the thrust of Policy 2 as it stands, other than to observe that there is much duplication of national policy within the supporting text, and it may be more effective to simply cross reference to the relevant parts of the NPPF rather than replicate commentary or requirements.

We welcome the approach to identifying area-specific requirements within Policy 2 – such as for the GNLP area, the focus on support for free standing decentralised, renewable and/or local carbon energy networks, providing energy supplies close to customers, especially when these can be designed as an integral part of development proposals. It should be noted that the SGV proposal includes such provision through a solar farm as an integral part of its wider ‘designed-in’ net zero carbon emission and green infrastructure provision. Only developments of the scale of a GV will deliver such sustainable development. Piecemeal edge developments will not comprise sufficient critical mass to do so.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24461

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Orbit Homes [10994]**Agent:** David Lock Associates (Heather Pugh, Partner) [20014]**Summary:**

SN Village Clusters Plan proposes to allocate sites for 1,200 homes. As a result, almost 10% of the total Greater Norwich new development to 2038 will be delivered essentially through a dispersed settlement strategy. We also maintain our procedural objection to the decision to draw up the two plans in parallel but not to jointly assess or record through the HELAA or SA processes the overall environmental impact of the GNLP as a whole. This approach would not be permissible through EIA of a development proposal, and we consider that the decision to adopt such an inconsistent approach could threaten the soundness of the GNLP evidence base.

SEE FULL REP ATTACHED

**Change suggested by respondent:**

The soundness of the plan in respect of delivering its objectives would be greatly strengthened through a reduction in the number/scale of site allocations to be made through the Village Clusters document, in favour of more overt commitment to the contribution that well-planned new settlement-scale growth.

SEE FULL REP ATTACHED

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Covering letter representing Orbit, Alston, Pelham - <https://oc2connect.gnlp.org.uk/a/4g3>  
Representation related to Strategy - <https://oc2connect.gnlp.org.uk/a/4g4>  
Rep related to HELAA - <https://oc2connect.gnlp.org.uk/a/4g5>  
Rep related to SA - <https://oc2connect.gnlp.org.uk/a/4g6>

24108

Object

**Policy 0451, 0451 Policy****Respondent:** Osborne Developments (Norwich) Ltd [20048]**Agent:** Mrs Sarah Clinch [19334]**Petition:** 2 petitioners**Summary:**

This letter comprise formal representations to the Regulation 19 Publication Greater Norwich Local Plan. They are made by Lanpro on behalf of Osborne Developments (Norwich) Ltd. in relation to Policy GNLP0451: Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street.

A representation form has been completed in relation to our comments. This is attached at Appendix A of this letter.

At present, we consider the plan is unsound in respect of draft policy GNLP0451: 'Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street'. Our reasons for this and the modifications we suggest would be necessary to make the policy sound, are set out below.

**Background**

Osborne Developments (Norwich) Ltd. own the site subject to draft policy GNLP0451: 'Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street'.

The site benefits from an extant planning permission for a 252-bed student accommodation scheme. Osborne Developments (Norwich) Ltd. intended to commence construction on site in summer 2021.

These representations are made to protect their interests, should any revisions to the scheme during construction be required.

See full submission for full details.

**Change suggested by respondent:**

See attachment for proposed modifications.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** Full Submission - <https://oc2connect.gnlp.org.uk/a/49f>

24366

Object

**Policy 2114, 2114 Policy****Respondent:** Our Place [19555]**Agent:** Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]**Petition:** 2 petitioners**Summary:**

The continued allocation of this site for redevelopment is welcomed by the site owner. We can confirm that the site is available for redevelopment and could be brought forward within the next five years.

The policy wording suggests that the site can deliver 110 dwellings and at least 5,000 sq m of employment floorspace. It is unclear how these figures have been arrived at. The planning history for the site is extensive and there have been a number of applications approved on the site that have not been implemented.

We would suggest that the site can deliver either in the region of 110 dwellings or 5,000 sq m of employment floorspace, or a mix of these uses. The mixed use scenario is the most likely outcome

Policy GNLP2114 policy is not justified or effective. Please see attached letter for details of full representation.

**Change suggested by respondent:**

Without incorporating the suggested changes to the policy or engaging with the site owner on how the current draft policy has been formulated we would suggest that the policy fails to meet the tests of the NPPF and the policy would be considered unsound.

The policy is mistaken in the quantum of floor space that can be delivered across the site and therefore it is not positively prepared, it will not enable the GNLP to meet its objectively assessed needs; this would also render the policy ineffective and undermine the overall strategy .

Please see attached letter for details of full representation including suggested rewording of the policy.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Policy GNLP2114 SGW Lanpro.pdf - <https://oc2connect.gnlp.org.uk/a/4wc>

24367

Object

**Policy 3054, 3054 Policy****Respondent:** Our Place [19555]**Agent:** Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]**Petition:** 2 petitioners**Summary:**

The continued allocation of this site for redevelopment is welcomed by the site owner. We can confirm that the site is available for redevelopment and could be brought forward within the next five years.

The minimum requirement for 150 dwellings is noted, despite our previous representations on this matter. We would suggest that this number should not be stated as a minimum but that the site should deliver in the region, or order, of 150 dwellings.

Policy GNLP3054 is not fully justified. Please see attached letter for full representation.

**Change suggested by respondent:**

The minimum requirement for 150 dwellings is noted, despite our previous representations on this matter. We would suggest that this number should not be stated as a minimum but that the site should deliver in the region, or order, of 150 dwellings.

Please see attached letter for full representation including suggested re wording of the policy.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Policy GNLP3054 SMW Lanpro rep - <https://oc2connect.gnlp.org.uk/a/4fx>

23307

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr David Owen [19804]**Summary:**

There has been no consultation for this second site and therefore it is illegal. The proposed development would place an excessive burden on the town's infrastructure.

**Change suggested by respondent:**

The second site for Aylsham proposed by Regulation 19 should be withdrawn because of its negative impact on the character of the town and its community.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None



23303

Object

**Policy 0596R, 4.7****Respondent:** Mr David Owen [19804]**Summary:**

As the Burgh Road site was agreed through consultation in reg.18, but Regulation 19 states there will be an additional proposed second site which has never been consulted. Therefore, this site has failed to be legally compliant. The second site should also be rejected because of its the impact on the carbon footprint as well as other environmental factors.

**Change suggested by respondent:**

Regulation 19 should be cancelled leaving the only new development in Aylsham to be Regulation 18.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23304

Object

**Policy 0596R, 4.8****Respondent:** Mr David Owen [19804]**Summary:**

This site is not legally compliant because there has been no consultation on Aylsham having two sites.

This site is not suitable owing to the lack of consultation on infrastructure its environmental impact in respect of education, health and social care and green infrastructure.

**Change suggested by respondent:**

Regulation 19 should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23305

Object

**Policy 0596R, 4.9****Respondent:** Mr David Owen [19804]**Summary:**

This comment is unsound and is not legally compliant because there was no consultation with either the public or Town Council on Regulation 19. The only consultation has been with Regulation 18 which had just the one site.

**Change suggested by respondent:**

The comment on consultation should be taken out of the document as it is not true for Regulation 19. Therefore the second site for Aylsham should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23306

Object

**Policy 0596R, 4.10****Respondent:** Mr David Owen [19804]**Summary:**

These proposals take no regard of the ancient heritage of such a small town as Aylsham which would be severely damaged by their implementation and are therefore unsound.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn. Regulation 19 does nothing to benefit the residents of Aylsham, on the contrary, only exacerbates the deterioration in its rural charm and ambience caused by Regulation 18.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24395

Object

**Site Assessment Booklets and Studies, Village Clusters – Broadland Assessment Booklets****Respondent:** Carl Palmer [20071]**Summary:**

Comments relating to Horsford in the context of sites GNLP0283 and GNLP0283R.

Please see attachment for full representation

**Change suggested by respondent:**

Please see attachment for full representation

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 2 - Delegated Report for application 20181408 dated 30 March 2020.pdf -<https://oc2connect.gnlp.org.uk/a/4fc>Appendix 3 - Decisions and plans relating to the development of 84 dwellings on land west of Holt Road, Horsford.pdf - <https://oc2connect.gnlp.org.uk/a/4fd>Supplementary Regulation 19 Response Form (22-03-2021).pdf - <https://oc2connect.gnlp.org.uk/a/4fw>

24396

Object

**Horsford, Settlement Map****Respondent:** Carl Palmer [20071]**Summary:**

Comments regarding Horsford in relation to sites GNLP0283 and GNLP0283R.

Please see attachment for full representation

**Change suggested by respondent:**

Please see attachment for full representation

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 2 - Delegated Report for application 20181408 dated 30 March 2020.pdf -<https://oc2connect.gnlp.org.uk/a/4fc>Appendix 3 - Decisions and plans relating to the development of 84 dwellings on land west of Holt Road, Horsford.pdf - <https://oc2connect.gnlp.org.uk/a/4fd>Supplementary Regulation 19 Response Form (22-03-2021).pdf - <https://oc2connect.gnlp.org.uk/a/4fw>

24397

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Carl Palmer [20071]**Summary:**

Horsford should not be part of a 'village cluster' and should instead form part of a Key Service Centre,

Please see attachment for full representation

**Change suggested by respondent:**

Please see attachment for full representation

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 2 - Delegated Report for application 20181408 dated 30 March 2020.pdf -<https://oc2connect.gnlp.org.uk/a/4fc>Appendix 3 - Decisions and plans relating to the development of 84 dwellings on land west of Holt Road, Horsford.pdf - <https://oc2connect.gnlp.org.uk/a/4fd>Supplementary Regulation 19 Response Form (22-03-2021).pdf - <https://oc2connect.gnlp.org.uk/a/4fw>

24398

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Carl Palmer [20071]**Summary:**

Horsford should not be part of a 'village cluster' and should instead form part of a Key Service Centre.

Please see attachment for full representation

**Change suggested by respondent:**

Please see attachment for full representation

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 2 - Delegated Report for application 20181408 dated 30 March 2020.pdf -<https://oc2connect.gnlp.org.uk/a/4fc>Appendix 3 - Decisions and plans relating to the development of 84 dwellings on land west of Holt Road, Horsford.pdf - <https://oc2connect.gnlp.org.uk/a/4fd>Supplementary Regulation 19 Response Form (22-03-2021).pdf - <https://oc2connect.gnlp.org.uk/a/4fw>

23321

Object

**Policy 0596R, 4.8****Respondent:** Mr David Patience [19488]**Summary:**

Lack of public consultation at all on Aylsham having two sites  
A very concerning matter indeed.

**Change suggested by respondent:**

The second site for Aylsham Regulation 19 should be withdrawn, as it is not sound nor legally compliant and should be rejected.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23295

Object

**Policy 0596R, 4.7****Respondent:** Mr David Patience [19488]**Summary:**

Burgh Road site was agreed under consultation Regulation 18  
The Norwich Road site GNLP0596R was not consulted with the Aylsham neighbourhood.  
Therefore I class this as an illegal approach by GNLP Planning.  
Could this be classed as under the radar move.  
Also look carefully at the site plan, 2 access roads from this site directly onto Norwich road.  
Again a bad planning projection, absolutely no consideration or forethought of the consequences this would cause for traffic entering /exiting Norwich road.

**Change suggested by respondent:**

We have had 3 very recent major housing developments within Aylsham boundaries,  
Willow Park - Bure Valley - St Michaels plus Aegel Gardens ( still developing ) plus smaller sites at Mill road plus Hungate St approx. 550 houses.  
This town is at saturation point.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23322

Object

**Policy 0596R, 4.10****Respondent:** Mr David Patience [19488]**Summary:**

A second site would provide significant issues for infrastructure that are not appropriate for the layout of this Medieval Town.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn.

There are no constructive benefits of a Park & Ride, we already have a regular bus service on this route with bus stops both sides of the road outside the old motel.

Therefore Reg 19 has significantly failed to the needs of the community.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23323

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr David Patience [19488]**Summary:**

This land should not be used for residential development, as there has been no consultation on a second site, therefore it is not legally compliant.

This is also true of the impact on the carbon neutral aims of central government, which are challenged by a second site. It is also unsound due to the failure to meet the infrastructure needs of the town.

There has been no consultation on the care home, the road improvements are limited to the vicinity of the site and the community use of the land offered.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn from Reg 19. the infrastructure needs of the Town need addressing before any further development.

The two recent developments failed to be of benefit for the majority of people who live in the Town.

What I am saying now, is we all need to look at the future focus, out of Brexit uncertainty of imports of food products i.e. Fruit & Veg we seriously need to look to our way forward, once we build on this arable (green field site) as it was once called will be gone, it will be irreversible.

I still cannot understand why Broadland and Norwich Council cannot come to some agreement to partner with landlords in Norwich to develop old unused office blocks and renovate for small shop outlets and more importantly convert to 1 - 2 - 3 or even 4 bed apartments within Norwich area, therefore reduce vehicle traffic coming in from the outer villages and the pollution. 550 houses could equate to 650 more cars and that's just from Aylsham.

Instead of grabbing all the arable farmland, the government is pushing the public hard to go green, how can this be achieved with all this development ongoing in our countryside.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23318

Object

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**Policy 0596R, 4.9****Respondent:** Mrs Teresa Patience [19827]**Summary:**

As there was no consultation with the Town Council on Regulation 19, only on Regulation 18 when there were plans for one site, this comment is not sound or legally compliant.

**Change suggested by respondent:**

The comment on consultation should be taken out of the document as it is not true on Regulation 19. So the second site for Aylsham should be rejected.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23319

Object

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**Policy 0596R, 4.10****Respondent:** Mrs Teresa Patience [19827]**Summary:**

A second site would not be suitable for Aylsham as it is a very old town and the existing infrastructure could not cope with this so there is a lack of soundness.

**Change suggested by respondent:**

There are no changes to the plan that would benefit this second site in Aylsham so this should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None



23316

Object

**Policy 0596R, 4.7****Respondent:** Mrs Teresa Patience [19827]**Summary:**

Regulation 18 stated that Aylsham would have one site that was put forward for consultation. Regulation 19 states there will now be two sites. This has never been put forward for public consultation. Therefore this second site should be withdrawn as it is not legally compliant.

**Change suggested by respondent:**

This second site should be rejected.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23317

Object

**Policy 0596R, 4.8****Respondent:** Mrs Teresa Patience [19827]**Summary:**

There has been no consultation with the Town Council or the residents of Aylsham regarding this second site under Regulation 19 so it is not legally compliant. As there has also been no consultation regarding infrastructure for this site it is not sound.

**Change suggested by respondent:**

Regulation 19 failed to consider the impact of two sites on the infrastructure needs of the town including schools, health facilities, roads and utilities so this second site should be rejected.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23320

Object

**Policy 0596R, 0596R Policy****Respondent:** Mrs Teresa Patience [19827]**Summary:**

Again there has been no consultation on the second site, so it is not legally compliant. The extra traffic that would this site would produce would increase Aylsham's carbon footprint plus there has been no consultation on the care home.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn from Regulation 19.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23721

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Mrs Rachel Pattison [19943]**Summary:**

Aubrey Rix Close is already a bottleneck for cars . It can be extremely tight getting in or out of the close due to the high number of vehicles already there. This development would add to this problem with works vehicles then new tenants vehicles in and out of a very small close.

**Change suggested by respondent:**

A different route to the new proposed properties.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24342

Support

**Marsham, 2143 Policy****Respondent:** Mr Graham Payne [20064]**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]

**Summary:**

On behalf of our client Graham Payne and family, we continue to strongly support the proposed allocation of Policy GNLP2143 - Land south of Le Neve Road, Marsham, within the Pre-Submission (Reg 19) version of the Greater Norwich Local Plan.

In respect of this site, for clarity, and context the previous representation made to the Regulation 18(C) 'Preferred Allocation' consultation in March 2020, is also provided, as Appendix 1. That representation clearly demonstrated, with evidence including an Access Appraisal, that the site was capable of providing the quantum of residential development now proposed (approximately 35 dwellings).

In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the proposed allocation represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site within the Plan period to 2038, and is viable. This is considered in further detail below.

**Available**

The land continues to be owned, in its entirety, by Graham Payne and family, and is available for development immediately. Graham Payne and family also owns land immediately to the south and west of the proposed allocation which, if required, is available for development.

**Suitable**

The overarching Policy 7 - Strategy for the Areas of Growth, identifies a settlement hierarchy. In accordance with this (as also outlined in Policy 1 - The Sustainable Growth Strategy), Marsham is specifically identified as a 'Village Cluster' (Policy 7.4).

The supporting text to Marsham acknowledges that as a settlement it has a primary school with spare capacity, village hall and public house. Notably at para. 6.84 it is stated that "it is considered that as well as existing allocations, approximately 50-60 new homes are appropriate for the settlement. The new allocation does not amount to this figure; however, further development is not ruled out. The Village Clusters policy 7.4 and Small Scale Windfall Housing Development Policy 7.5 both allow for an amount of growth in each village cluster that reflects primary school capacity."

Given the suitability of Marsham, the allocation of the site will help achieve the GNLP's aspirations of focusing growth in village locations to promote social sustainability by supporting rural life and services. It will help support the GNLP's aspiration of achieving 9% of total housing growth in the GNLP in Village Clusters (482 dwellings in Broadland).

**Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could threaten the delivery of residential development on the site. As readily acknowledged within Policy 7.4, the provision of village clusters, and by example this site, represents the provision of a relatively small allocation as required by the NPPF, and means this approach has the benefit of supporting small-scale builders, therefore providing choice for the market and helping to ensure the delivery of housing in popular village locations.

Accordingly, we are confident that this site will meet a particular need in the market, and be desirable for a range of developers, ensuring deliverability.

We acknowledge the site policies reference to the need to liaise with Anglian Water concerning upgrades to the Aylsham Water Recycling Centre, but remain confident that the site will be entirely delivered within the plan period.

**Viable**

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

**Change suggested by respondent:**

-

Legally Yes

compliant:

Sound: Yes

Comply with Yes

duty:

Appear exam: Appearance at the examination

Attachments: None

## 23443

## Object

### Policy 5 Homes, Policy 5 Homes

**Respondent:** Perseus Land and Developments [19865]

**Agent:** Gillings Planning (Mrs Anna Gillings, MD) [19864]

#### Summary:

The policy confirms that 'major residential developments' defined as over 10 dwellings will require affordable housing. However, the wording relating to care homes and extra care suggests this requirement will also apply to these uses. The Viability Report (2020) is clear that no account has been taken of care homes, nor extra care, in determining the viability of affordable housing. On this basis the last sentence should be deleted as it is not evidence based. If the case is made for extra care subsequently, the policy must still state it is not required for care homes. Unsound without this amendment.

#### Change suggested by respondent:

Either:

Delete the following:

"..... Irrespective of C2 or C3 use class classification, specialist older people's housing will provide 33% affordable housing or 28% in the city centre."

or amend to include brackets:

"...Irrespective of C2 or C3 use class classification, specialist older people's housing (excluding residential/nursing homes) will provide 33% affordable housing or 28% in the city centre."

Legally Yes

compliant:

Sound: No

Comply with Yes

duty:

Appear exam: Appearance at the examination

Attachments: None

24138

Object

**Transport, 240****Respondent:** David Pett [19977]**Summary:**

1. This response is submitted on behalf of the Stop the Wensum Link campaign (SWL). SWL comprises ecologists, scientists, lawyers, academics and environmentalists. SWL is supported by concerned individuals, who consider there is no need for the proposed Norwich Western Link (NWL) infrastructure project, and who argue it should be suspended.
2. SWL strongly objects to the inclusion of the NWL within the GNLP (Plan). Interestingly, the Plan purports to exclude the NWL when it is manifestly obvious the intention is to include it (see below). SWL finds this pretence to be wholly objectionable.

See attachment for full response

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** SWL GNLP Response .pdf - <https://oc2connect.gnlp.org.uk/a/4v6>

24139

Object

**Transport, 240****Respondent:** David Pett [19977]**Summary:**

1. This response is submitted on behalf of the Stop the Wensum Link campaign (SWL). SWL comprises ecologists, scientists, lawyers, academics and environmentalists. SWL is supported by concerned individuals, who consider there is no need for the proposed Norwich Western Link (NWL) infrastructure project, and who argue it should be suspended.
2. SWL strongly objects to the inclusion of the NWL within the GNLP (Plan). Interestingly, the Plan purports to exclude the NWL when it is manifestly obvious the intention is to include it (see below). SWL finds this pretence to be wholly objectionable.

See attachment for full response

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** SWL GNLP Response .pdf - <https://oc2connect.gnlp.org.uk/a/4v6>

24140

Object

**Infrastructure, 138****Respondent:** David Pett [19977]**Summary:**

1. This response is submitted on behalf of the Stop the Wensum Link campaign (SWL). SWL comprises ecologists, scientists, lawyers, academics and environmentalists. SWL is supported by concerned individuals, who consider there is no need for the proposed Norwich Western Link (NWL) infrastructure project, and who argue it should be suspended.
2. SWL strongly objects to the inclusion of the NWL within the GNLP (Plan). Interestingly, the Plan purports to exclude the NWL when it is manifestly obvious the intention is to include it (see below). SWL finds this pretence to be wholly objectionable.

See attachment for full response

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** SWL GNLP Response .pdf - <https://oc2connect.gnlp.org.uk/a/4v6>

24141

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** David Pett [19977]**Summary:**

1. This response is submitted on behalf of the Stop the Wensum Link campaign (SWL). SWL comprises ecologists, scientists, lawyers, academics and environmentalists. SWL is supported by concerned individuals, who consider there is no need for the proposed Norwich Western Link (NWL) infrastructure project, and who argue it should be suspended.
2. SWL strongly objects to the inclusion of the NWL within the GNLP (Plan). Interestingly, the Plan purports to exclude the NWL when it is manifestly obvious the intention is to include it (see below). SWL finds this pretence to be wholly objectionable.

See attachment for full response

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** SWL GNLP Response .pdf - <https://oc2connect.gnlp.org.uk/a/4v6>

23466

Object

**Aylsham, Settlement Map****Respondent:** Nicola Phillips [19877]**Petition:** 3 petitioners**Summary:**

We wonder if we could lodge our concerns with you regarding the planned development of two areas of Aylsham as part of the Greater Norwich Local plan (GNLP). The planning for 250 houses (and possibly a school) on the Burgh Road Site was agreed in 2019 but it would seem that planning for a further 300 houses and a bus depot for a park & ride service (on the old motel site and adjacent field) has also been agreed last year under a resolution 19 order off the back of the first consultation.

We're very aware that under Resolution 19 we can't make comments on the content of the plan but can certainly comment on whether we feel that the plans can be classed as legal, sound and justified.

Regarding the obvious impact this will have on the infrastructure of the town we would like to highlight our very particular concerns regarding the effect this will have on the water supply. We have our own private water supply here (bore hole) and we would like to see evidence that due diligence has been observed in protecting private water supplies like ours. We have been advised that if a private water company was to sink a new bore hole in farm land for irrigation purposes it has a legal obligation to test pump all bore holes and wells within a specified area over a two week period to establish the effect it has on the drawdown. On that basis, we think we are well within our rights to challenge how sound the planning has been.

We would be very grateful if you could take on board our concerns.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24234

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24235

Object

**Hethersett, 5.28****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>



24236

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Issues and Policy 5 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 5 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>

Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>

Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24237

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 6 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 6 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>

Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>

Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24238

Object

### Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

**Petition:** 2 petitioners

**Summary:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>

Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>

Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24239

Object

### Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres

**Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

**Petition:** 2 petitioners

**Summary:**

Please see the section addressing Policy 7.3 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 7.3 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>

Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>

Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24518

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>

Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>

Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24519

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 2 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 2 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>

Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>

Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24520

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24521

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 4 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Change suggested by respondent:**

Please see the section addressing Policy 4 in the attached representations submitted on behalf of the Hethersett Consortium in support of the allocation of Land at Hethersett.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Land at Hethersett representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cr>Appendix 1 - Land at Hethersett Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cs>Appendix 2 School and Childcare Sufficiency in Norfolk.pdf - <https://oc2connect.gnlp.org.uk/a/4ct>

24277

Object

**Policy 0102, 0102 Policy****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>  
Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cj>

24278

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Summary:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>  
Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cj>

24279

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Summary:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>  
Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cj>

24280

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Summary:**

Please see the section addressing Policy 5 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 5 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>  
Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cj>

24281

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

### Summary:

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

### Change suggested by respondent:

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>  
Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cj>

24282

Object

## Policy 7.2 The Main Towns, Policy 7.2 The Main Towns

**Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

### Summary:

Please see the section addressing Policy 7.2 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

### Change suggested by respondent:

Please see the section addressing Policy 7.2 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>  
Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf - <https://oc2connect.gnlp.org.uk/a/4cj>

24283

Object

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**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements**

**Respondent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]

**Summary:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land at Walcot Green Lane, Diss.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land at Walcot Green Lane, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cx>

Appendix 1 - Land at Walcot Green Lane, Diss Delivery Statement.pdf -

<https://oc2connect.gnlp.org.uk/a/4cj>

23923

Object

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**Aylsham, Settlement Map**

**Respondent:** Mr Malcolm Pim [19542]



**Summary:**

We write as Aylsham residents who are astonished at the process which appears to have been followed in the progression of the GNLP as it relates to this area. We know, of course, that Aylsham is an attractive town which is also popular because of its location midway between Norwich and the north coast. We moved here nearly 40 years ago and are fully aware of how fortunate we have been in being able to raise our children here and, now, to enjoy our retirement here. We understand that many other people will wish to live here and that some growth has been necessary to enable that to happen. However, in the time we have lived here, there have been FOUR major developments - Norfolk Homes, Hopkins Homes, Willow Park and Bure Meadows - which have placed enormous pressure on the local infrastructure as well as a number of "infill" developments.

We do not believe that the proper processes around Regulation 19 have been followed by Broadland District Council and that, as a result, the current proposals are not legally compliant, nor do they satisfy the "soundness" criterion. The LPA's Statement of Community Involvement and Para 155 of the National Planning Policy Framework require that genuine engagement and community involvement must occur. Apart from any other details, how can that criterion be satisfied if there has been no contact with Aylsham Town Council regarding Regulation 19 and no attempt at proactively engaging with the local community? To propose an increase of over 80% in the number of new houses suggested - compared with the proposal under Regulation 18 - without engagement with the local community or its local representatives is a gross dereliction of the Council's duties.

As for the "soundness" criterion, we have seen no evidence that the impact on education, health or social care facilities has been taken into account. The proposal for a "new" school actually appears to relate to a replacement for an existing school with no indication of increased capacity. Nursery provision in the town is severely limited and the closure of Children's Centres by the County Council has only contributed further to the reduction of supportive facilities for young families. No attention appears to have been given to these factors. Similarly, Aylsham's road network is already under enormous pressure and its historic layout gives limited scope for expansion or alteration. Parking is already a very significant problem - shortage of parking tends to drive people away from shopping in the town, going instead to Norwich or other nearby towns where it is easier to park. This has a very damaging effect on the viability of local shops. More broadly, no proper attention has been directed towards "whole town" solutions to traffic and parking issues.

Issues of sustainability and the impact of climate change appear to have been ignored. An increase in housing at the level proposed in Regulation 19, with new houses at the extremities of the town, will result in a significantly greater use of cars leading to an increased, rather than decreased, carbon footprint. This seems grossly irresponsible at this time.

Finally, it has to be said that the Town Council and the local population thoroughly engaged in the work leading up to the Aylsham Neighbourhood Plan, signed off in 2019. To proceed in the ways now proposed by the District Council entirely flies in the face of that engagement and will destroy local faith in those democratic processes. It seems to us that the ONLY beneficiaries of the plans now proposed by the District Council will be developers who have already benefited greatly from planning decisions over the past 40 years. It is now time to prevent further damage to a beautiful town and strong community.

**Change suggested by respondent:**

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**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appeal exam:** Not specified

**Attachments:** None

24476

Object

## Site Assessment Booklets and Studies, Viability Study

**Respondent:** Dentons (Roy Pinnock) [20016]

### Summary:

#### 1 Representation

1.1 We welcome the positive basis on which the overall Plan approach has been prepared, in particular the introduction of significant housing supply to contribute to the housing trajectory from strategic regeneration sites. It is clear from the published Trajectory that these sites will make a critical contribution to overall supply (both in terms of amount and resilience of supply) throughout the Plan period.

#### 2 Soundness Issues

2.1 Based on the currently-published information, the Plan is not demonstrably sound in terms of justification, effectiveness and consistency with NPPF in respect of

- (a) evidence of infrastructure need and associated costs;
- (b) deliverability.

2.2 This gives rise to concerns about soundness for the purposes of NPPF35 and 16(b).

2.3 The Interim Viability Study did assess the deliverability of the ESRA with the scale of infrastructure contributions likely to be required. The scale of these contributions and the extent to which the

2.4 The NPS Final Viability Report (12 January 2021, FVR) adopts a generic 1,000 home typology (T11) but this does not relate to the ESRA and the FVR acknowledges that:

56. With regard to the assessment of 'specific circumstances of strategic sites' it is acknowledged that such sites will be impacted by strategic infrastructure costs over and above the usual developments costs of an average development site.

57. These strategic sites will be appraised in greater detail independently. What this Viability Appraisal achieves is to demonstrate whether the development of notional sites using an adjusted but standardised approach, can incorporate the emerging planning policies into the development costs while still achieving a satisfactory developers return and adequate land value to ensure land is bought forward for development.

2.5 As such, the evidence base for the Plan does not adequately demonstrate the following in relation to the ESRA:

- (a) What the scale of burdens are intended to be in the ESRA (including the relative contribution of CIL); or
- (b) How those burdens will affect deliverability.

2.6 That is contrary to both limbs of NPPF34.

2.7 The Plan should be clear about the scale of costs assumed for the ESRA, as well as amore appropriate land value and site preparation cost dynamics and constraints. It should not defer that to a SPD stage, which is not subject to EiP and which would create doubt about the requirements applicable to ESRA sites under Policies 5, 7.1 and GNLP0360/3053/R10.

2.8 This reflects the emphasis in the Planning Practice Guidance in relation to Local Plan preparation that:

Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.

2.9 PPG recognise that area-wide assessment is limited and "more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies". More detailed assessment on the issues above in relation to the ESRA is needed at this stage to properly support the welcome allocation of the ESRA as a regeneration area that is needed to make a substantial contribution to housing supply, effective use of previously developed land and environmental improvement over the plan period.

2.10 We also consider that the requirements for the ESRA SPD have not been adequately established in Policies 7.1 and GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective.

### Change suggested by respondent:

-

**Legally** Not specified  
**compliant:**  
**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Not specified

**Attachments:** Dentons - GNLP R19 Reps(77279154\_1).DOCX - <https://oc2connect.gnlp.org.uk/a/4g7>

24477

Object

## Utilities, 0360/3053/R10 Policy

**Respondent:** Dentons (Roy Pinnock) [20016]

### Summary:

#### 1 Representation

1.1 We welcome the positive basis on which the overall Plan approach has been prepared, in particular the introduction of significant housing supply to contribute to the housing trajectory from strategic regeneration sites. It is clear from the published Trajectory that these sites will make a critical contribution to overall supply (both in terms of amount and resilience of supply) throughout the Plan period.

#### 2 Soundness Issues

2.1 Based on the currently-published information, the Plan is not demonstrably sound in terms of justification, effectiveness and consistency with NPPF in respect of

- (a) evidence of infrastructure need and associated costs;
- (b) deliverability.

2.2 This gives rise to concerns about soundness for the purposes of NPPF35 and 16(b).

2.3 The Interim Viability Study did assess the deliverability of the ESRA with the scale of infrastructure contributions likely to be required. The scale of these contributions and the extent to which the

2.4 The NPS Final Viability Report (12 January 2021, FVR) adopts a generic 1,000 home typology (T11) but this does not relate to the ESRA and the FVR acknowledges that:

56. With regard to the assessment of 'specific circumstances of strategic sites' it is acknowledged that such sites will be impacted by strategic infrastructure costs over and above the usual developments costs of an average development site.

57. These strategic sites will be appraised in greater detail independently. What this Viability Appraisal achieves is to demonstrate whether the development of notional sites using an adjusted but standardised approach, can incorporate the emerging planning policies into the development costs while still achieving a satisfactory developers return and adequate land value to ensure land is bought forward for development.

2.5 As such, the evidence base for the Plan does not adequately demonstrate the following in relation to the ESRA:

- (a) What the scale of burdens are intended to be in the ESRA (including the relative contribution of CIL); or
- (b) How those burdens will affect deliverability.

2.6 That is contrary to both limbs of NPPF34.

2.7 The Plan should be clear about the scale of costs assumed for the ESRA, as well as amore appropriate land value and site preparation cost dynamics and constraints. It should not defer that to a SPD stage, which is not subject to EiP and which would create doubt about the requirements applicable to ESRA sites under Policies 5, 7.1 and GNLP0360/3053/R10.

2.8 This reflects the emphasis in the Planning Practice Guidance in relation to Local Plan preparation that:

Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.

2.9 PPG recognise that area-wide assessment is limited and "more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies". More detailed assessment on the issues above in relation to the ESRA is needed at this stage to properly support the welcome allocation of the ESRA as a regeneration area that is needed to make a substantial contribution to housing supply, effective use of previously developed land and environmental improvement over the plan period.

2.10 We also consider that the requirements for the ESRA SPD have not been adequately established in Policies 7.1 and GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Dentons - GNLP R19 Reps(77279154\_1).DOCX - <https://oc2connect.gnlp.org.uk/a/4g7>

**24424****Object****Policy 0337R, 0337R Policy**

**Respondent:** Lindy Platten-Jarvis [18674]

**Summary:**

**Legal compliancy:** as a pensioner living on a blind corner on a C road with only 2 or 3 seconds visibility on either side, where 6 feet of my garden, angle of repose (to a 4ft bank) has been stolen without any consultation with me, and my calls for help for the past 3 decades, I feel I should have been notified by mail about this great adverse impact on my personal safety; I have been calling for help for 30 years.

**Unsound:** This is highly unsound because the problems of high volumes of traffic speeding through the C roads of Felthorpe have been causing the residents, in particular in The Street, Church Lane and NR10 4DR Taverham Road, on inadequate for purpose roads, have been the subject of complaints from residents for the past 3 decades.

In order to become sound, these long-term serious problems must be finally addressed in the GNLP.

The B1149 Holt Road in Horsford is a major cause of problems for residents. Since the Northern Broadway was built, this B road (B1149) has had some major housing developments. Queueing to access the NDR has meant more vehicles elect to go through the C roads of Felthorpe, causing headaches for the residents of Felthorpe, as the rat-running to the NDR and to the north of the Southern Bypass runs through Felthorpe Street and the Taverham Road. When our inadequate bus service route went via Horsford, there were many roadworks & volume of traffic and traffic lights problems the back-up queues to the NDR lengthened the Qs for the NDR and many reverted to the Felthorpe route again. The B1149 and the C262,3 etc roads are even less capable of handling the volume of traffic and all these roads have needed regular patching and mending potholes. An indication of the dangers of the sharp bends on Taverham Road – The Yew Tree Bends – are that Highways would only repaint the badly faded ‘slow’ road signs when they had traffic control in place. Pedestrians using the amenities of the woods must be similarly endangered when they take their children &/or dogs for a walk round the beautiful network of walks that join up with miles of different routes & also Marriotts Way. It is appalling that pre-the tarmacking exercise, one could walk off road with relative safety.

All of these roads need to be made more durable before vast numbers of new households begin to use them (1400 vs 300 approx in Felthorpe).

And the former grassy verges between the bends of Taverham Road should be restored – it can be done cheaply by demarking them by dotted lines – and/or creating a one-way system using the Felthorpe Street continuation to the Reepham Rd (class C). A walkable footpath should be made on the verges to the Reepham Road to allow pedestrians acces to the wonderful resources of GNLP0337R, without the dangers of speeding traffic.

I thought it was part of the charter for Highways to preserve footpaths not obliterate them, causing me to be apparently walking on tarmac when I am stepping above my former hedge, 4ft high bank & angle of repose on ¼ mile of formerly single track road that was suddenly made into a double track road. The road-steal was done quickly and with no notice or consultation. This may have been because the owners of Yew Tree Farm owned all the former footpaths along this stretch apart from mine. In fact they shaved off all the hedge side branches that protected most of the angle of repose. Increase in amount, size of vehicles, and the various stages of the Southern Bypass & NDR have speeded up and exacerbated the dangers immensely.

In a letter from the Highways Engineer, Mr K Townley wrote that the bend around my garden was a pinch-point. Solicitors

looked at road maps and advised me the road track was only 12ft wide formerly.

After tarmacing had been accomplished Mr Townly said it must be easier for me to walk on tarmac than the eroded grass and sand (which tyre tracks had made uneven). Physically easier perhaps but not safe – in fact lethal and worrying and depressing. It seems the ideal conditions to satisfy a Wieldon Boroughs argument. I put myself in harm's way to live life. Covid 19 has made great changes for the entire world but I continue to have massively frightening conditions re access/egress to my own property. This has not eased during lockdown with multiple near-misses. When I cross the road to get my medication & mail, I almost never manage to complete each single crossing without an unseen-at-the-start vehicle following me along a now vergeless road for the end of my walk. I walk with hi-viz jacket and a walking stick. Highways covered the walking verges on both sides of the then single width lane with tarmac making a double width 2-vehicle road from a single lane road – thereby destroying safe walking from the barn to beyond the southern-most bend.

Loss of angle of repose

Erosion of 4ft high garden bank

Erosion killed off my elm hedge

Erosion continues as vehicles go on-bank/off road to pass.

A photo from 1972 (aerial) shows the double hedge (about 6ft thick). Loss of these former footpaths endangers locals accessing the amenity of the wood – walking network. I have been hit by a car while walking on the kerb in the hedge row. (I.e. not on the tarmac).

There is no longer anywhere to park a car to deliver essential goods or services (I have carers). During a 1990s site visit by the engineer, even numbered (30-40) dwellings were ordered to move their boundaries to the west in order to make room for a footpath. This footpath is not fit for purpose; to use it (W side of rd) involves crossing on a blind corner once (twice for me). Accessing the footpath involves using road without any off road verges at all – they are no longer there. These unsafe sections have to be negotiated by all pedestrians.

No safe place to park for visitors, taxis, carers and deliveries. All residents along Taverham Road have difficulty driving into the traffic stream. The New path has too many posts – which are constantly being damaged or replaced – to walk easily with a buggy or shopping trolley. It is too dangerous for me to cross the road twice on blind corners to use it. I have to get all my essential household requirements, shopping by walking along the road. It is safer not to use the footpath at all. However the footpath has puddles the entire length and one gets wet crossing to the path and soaked by spray from the traffic. Flooding.

Cyclists can't be heard approaching. In the 1990s Post Office Health and Safety said the road was too dangerous for staff to deliver my mail. I must put a post box across the road (from east to west) and further north around the bend. 1994 or 1996 the village shop sent me a letter (I can get a copy after lockdown & shielding) to say they had to stop delivering my newspaper as it is too dangerous for their staff to cross the road & deliver. There is always a large puddle (grills are not at the nadir), grills often blocked. This makes a further hazard to getting my mail & medication. I get medication but it is delivered to the mail box and not to my door (risk too high).

At least 2 friends have written to the authorities saying it is too dangerous to visit me. One is convinced I saved her life by pulling her off the road into my pedestrian gateway.

Leaving my gate there are only 2 seconds on sight of a car before it crosses by my gate (1 ½ car lengths). Putting up mirrors opposite only gives 3 seconds of safety. In inclement weather the mirrors are of no use, as obscured by rain &/or snow &/or splashing from vehicles going through the puddle. Sound gets deflected by the bends, and of course pushbikes don't make a sound and collisions are more likely.

There are huge puddles all the way along the Taverham Road and no lasting solution has been made. There is such a high volume of traffic that the ½ mile walk to the bus stop makes it difficult to make progress. Other residents have complained about this, pedestrians trying to get to the play ground with their children and conscientious drivers who have to wait for oncoming cars to avoid splashing pedestrians.

There are frequently potholes around the far side of the bend near me. I know of a cyclist who fell from his bike after hitting one. At the moment, as I write there are 3 potholes (reported) some hidden beneath the puddle. One was made in the middle of the night by the NCC team 'repairing' a blocked drain. It is now twice the original size.

Around 'my' bend, pedestrians walking on a vergeless road, have to walk into the road to avoid the puddles. The surface of the tarmac is rutted and so the puddles in the tyre track ruts are also hazardous and make an additional obstacle to avoid when crossing/walking along the road.

When my wheelie bins were delivered it was decided by them that it would be too dangerous to stop on the corner & empty them. I was issued with bags, which the team pick up as they walk from one stop (nos 40, 38) to another (no 41).

The bags are left in a corral at hand height so the men (or women) don't have to bend. However they are a potential health hazard as they encourage vermin and can get nibbled. Cats love to spray them.

Often the bins get missed on the Friday pick up and phone call reports rarely result on the bins being collected until after the weekend. No 41 have blamed me for their infestations of mice & rats in their loft. During all the time they have lived next door I have not had any bait taken from my loft. I also keep the household waste bag indoors to keep the risk of rodent-ripping down, but it is not always possible to keep rotten food in my fridge. During the snowy weather in February 2021, I had to take a broom to remove icy, water slush from the road; an additional hazard to get my medication. Household necessities for living all have to be brought in my wheeled shopper twice a week. Inter-Covid-19-lockdowns I used paid services to get my shopping – sometimes as many as 6 double-trips across the road. Deliveries being impossible and the loss of the internet means I cannot order essential shopping. It was desperately awful to cope with this. I had to transport shopping bags myself, using the helper to keep an eye on the road. During lockdown 3 a friend from Horsford has been bringing a weekly shop. I am desperately worried for her safety as she makes the journey from her car.

As I write today (10th March) it is my birthday I am 73 & have been unfit for work since 15/2/92 so my carer took me to the post office – first visit in 2021 – and we went through Horsford. I was appalled at the state of the road, the traffic levels, traffic lights. I cannot understand why there is application GNL264 [sic] for 45 new households since 2 new major developments recently finished/started have resulted in a new roundabout, increased traffic and a poor quality B road, although there are pavements on each side of the road more houses are unsound for the environment.

Felthorpe Street is being traffic calmed by introducing pinch points. I understood Taverham Road doesn't qualify, although the no (38.40.39) shows the road narrows and an early letter from the Area Engineer calls it a pinch point (38/40/39) letter in 1990s why can't this pinch point be reinstated?

Felthorpe Street pavements are not contiguous and to walk through the street involves much crossing of a busy C road. In case I forget to mention it in section 6, it would be a good idea to put zebra crossings for pedestrians at each artificial pinch point along the street. Horsford has zebra crossings including lights.

Since I last wrote, I observed within 2 hours 3 HGVs (metal trucks) going the unlawful way around the HGV one way system, which was inaugurated many years ago, subsequent to the many suggestions I made. This morning (15th March) an HGV with a crane on sped around the corner. At best (see photos taken August 2019) two cars can barely pass. My neighbours & I often remove wing mirrors & pieces of car body from the road. Two Bedford vans cause a snarl up, which is generally noisy. Can't enjoy quite peaceful enjoyment of my garden. Apart from a roomsize courtyard at the back, all my garden borders the road. Traffic noise prevents me from listening to the radio in my garden & in my conservatory. And the exhaust fumes are dangerous to me an malodourous.

The bus home in the winter means getting from the bus stop to home, in the dark there is an additional hazard: as well as enforced walking on the road, you can get dazzled by headlights and the no43 floodlight is blinding. The pavement is not level and is dangerous when icy. Evasive action has to be taken up the driveways to miss vehicle spray – it goes right over the pathway. It is in all a half mile journey.

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2. Paint in dotted lines to delineate former verges for pedestrian safety to be re-established
3. Impose 20mph signs on Taverham Road. The new Northern roundabout in Horsford has 20mph signs: on Haveringland Lane close by 40mph signs
4. One-way system around the woods, note Barry Cannell Trials
5. Traffic lights around the bends to make single file traffic (if not one-way system)
6. Zebra crossings either end of Westside TR footpath to allow safety using same
7. Zebra crossings painted at all the pinch points on Felthorpe Street
8. More zebra crossings in Horsford for bus passengers to reach bus stops to/from home
9. A roundabout should be installed where the Reepham Road, Fir Covert Road & Taverham Roads. Visibility from the junction is poor and there was a recent fatality there, unsafe staggered X roads.
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11. A Health & Safety survey should be made along Taverham Road, particularly with respect to Yew Tree Cottage. It has been requested, but requests have been ignored.
12. The current situation discriminates against the disabled
13. The 1400 new houses build will include many amenities which Felthorpe has lost. We 300 residencies can no longer walk safely down the Taverham Road to the Reepham Road, which I used to do to catch the workers' bus. As well as reinstating our verges, a level pathway from there to the Reepham road should be made so we can again walk in safety to use amenities and facilities lost to Felthorpe.
14. 1400 new homes with primary school & medical facilities will be generating money. Some of this needs to be diverted into the local areas to make us safer from the traffic which will be generated.
15. There must be public toilet facilities on the site.

Please note, I have plenty of evidence of the 30 years correspondence in my efforts to improve the safety issues locally. However as a vulnerable OAP shielding from Covid I cannot without breaking the rules provide this evidence at this time.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Photographs - <https://oc2connect.gnlp.org.uk/a/4gn>



24425

Object

**Policy 0264, 0264 Policy****Respondent:** Lindy Platten-Jarvis [18674]**Summary:**

Legal compliancy: as a pensioner living on a blind corner on a C road with only 2 or 3 seconds visibility on either side, where 6 feet of my garden, angle of repose (to a 4ft bank) has been stolen without any consultation with me, and my calls for help for the past 3 decades, I feel I should have been notified by mail about this great adverse impact on my personal safety; I have been calling for help for 30 years.

Unsound: This is highly unsound because the problems of high volumes of traffic speeding through the C roads of Felthorpe have been causing the residents, in particular in The Street, Church Lane and NR10 4DR Taverham Road, on inadequate for purpose roads, have been the subject of complaints from residents for the past 3 decades.

In order to become sound, these long-term serious problems must be finally addressed in the GNLP.

The B1149 Holt Road in Horsford is a major cause of problems for residents. Since the Northern Broadway was built, this B road (B1149) has had some major housing developments. Queueing to access the NDR has meant more vehicles elect to go through the C roads of Felthorpe, causing headaches for the residents of Felthorpe, as the rat-running to the NDR and to the north of the Southern Bypass runs through Felthorpe Street and the Taverham Road. When our inadequate bus service route went via Horsford, there were many roadworks & volume of traffic and traffic lights problems the back-up queues to the NDR lengthened the Qs for the NDR and many reverted to the Felthorpe route again. The B1149 and the C262,3 etc roads are even less capable of handling the volume of traffic and all these roads have needed regular patching and mending potholes. An indication of the dangers of the sharp bends on Taverham Road – The Yew Tree Bends – are that Highways would only repaint the badly faded 'slow' road signs when they had traffic control in place. Pedestrians using the amenities of the woods must be similarly endangered when they take their children &/or dogs for a walk round the beautiful network of walks that join up with miles of different routes & also Marriotts Way. It is appalling that pre-the tarmacking exercise, one could walk off road with relative safety.

All of these roads need to be made more durable before vast numbers of new households begin to use them (1400 vs 300 approx in Felthorpe).

And the former grassy verges between the bends of Taverham Road should be restored – it can be done cheaply by demarking them by dotted lines – and/or creating a one-way system using the Felthorpe Street continuation to the Reephram Rd (class C). A walkable footpath should be made on the verges to the Reephram Road to allow pedestrians acces to the wonderful resources of GNLP0337R, without the dangers of speeding traffic.

I thought it was part of the charter for Highways to preserve footpaths not obliterate them, causing me to be apparently walking on tarmac when I am stepping above my former hedge, 4ft high bank & angle of repose on ¼ mile of formerly single track road that was suddenly made into a double track road. The road-steal was done quickly and with no notice or consultation. This may have been because the owners of Yew Tree Farm owned all the former footpaths along this stretch apart from mine. In fact they shaved off all the hedge side branches that protected most of the angle of repose. Increase in amount, size of vehicles, and the various stages of the Southern Bypass & NDR have speeded up and exacerbated the dangers immensely.

In a letter from the Highways Engineer, Mr K Townley wrote that the bend around my garden was a pinch-point. Solicitors looked at road maps and advised me the road track was only 12ft wide formerly.

After tarmacing had been accomplished Mr Townly said it must be easier for me to walk on tarmac than the eroded grass and sand (which tyre tracks had made uneven). Physically easier perhaps but not safe – in fact lethal and worrying and depressing. It seems the ideal conditions to satisfy a Wieldon Boroughs argument. I put myself in harm's way to live life. Covid 19 has made great changes for the entire world but I continue to have massively frightening conditions re access/egress to my own property. This has not eased during lockdown with multiple near-misses. When I cross the road to get my medication & mail, I almost never manage to complete each single crossing without an unseen-at-the-start vehicle following me along a now vergeless road for the end of my walk. I walk with hi-viz jacket and a walking stick. Highways covered the walking verges on both sides of the then single width lane with tarmac making a double width 2-vehicle road from a single lane road – thereby destroying safe walking from the barn to beyond the southern-most bend.

Loss of angle of repose

Erosion of 4ft high garden bank

Erosion killed off my elm hedge

Erosion continues as vehicles go on-bank/off road to pass.

A photo from 1972 (aerial) shows the double hedge (about 6ft thick). Loss of these former footpaths endangers locals accessing the amenity of the wood – walking network. I have been hit by a car while walking on the kerb in the hedge row. (I.e. not on the tarmac).

There is no longer anywhere to park a car to deliver essential goods or services (I have carers). During a 1990s site visit by the engineer, even numbered (30-40) dwellings were ordered to move their boundaries to the west in order to make room for a footpath. This footpath is not fit for purpose; to use it (W side of rd) involves crossing on a blind corner once (twice for me). Accessing the footpath involves using road without any off road verges at all – they are no longer there.

These unsafe sections have to be negotiated by all pedestrians.

No safe place to park for visitors, taxis, carers and deliveries. All residents along Taverham Road have difficulty driving into the traffic stream. The New path has too many posts – which are constantly being damaged or replaced – to walk easily with a buggy or shopping trolley. It is too dangerous for me to cross the road twice on blind corners to use it. I have to get all my essential household requirements, shopping by walking along the road. It is safer not to use the footpath at all. However the footpath has puddles the entire length and one gets wet crossing to the path and soaked by spray from the traffic. Flooding.

Cyclists can't be heard approaching. In the 1990s Post Office Health and Safety said the road was too dangerous for staff to deliver my mail. I must put a post box across the road (from east to west) and further north around the bend.

1994 or 1996 the village shop sent me a letter (I can get a copy after lockdown & shielding) to say they had to stop delivering my newspaper as it is too dangerous for their staff to cross the road & deliver. There is always a large puddle (grills are not at the nadir), grills often blocked. This makes a further hazard to getting my mail & medication. I get medication but it is delivered to the mail box and not to my door (risk too high).

At least 2 friends have written to the authorities saying it is too dangerous to visit me. One is convinced I saved her life by pulling her off the road into my pedestrian gateway.

Leaving my gate there are only 2 seconds on sight of a car before it crosses by my gate (1 ½ car lengths). Putting up mirrors opposite only gives 3 seconds of safety. In inclement weather the mirrors are of no use, as obscured by rain &/or snow &/or splashing from vehicles going through the puddle. Sound gets deflected by the bends, and of course pushbikes don't make a sound and collisions are more likely.

There are huge puddles all the way along the Taverham Road and no lasting solution has been made. There is such a high volume of traffic that the ½ mile walk to the bus stop makes it difficult to make progress. Other residents have complained about this, pedestrians trying to get to the play ground with their children and conscientious drivers who have to wait for oncoming cars to avoid splashing pedestrians.

There are frequently potholes around the far side of the bend near me. I know of a cyclist who fell from his bike after hitting one. At the moment, as I write there are 3 potholes (reported) some hidden beneath the puddle. One was made in the middle of the night by the NCC team 'repairing' a blocked drain. It is now twice the original size.

Around 'my' bend, pedestrians walking on a vergeless road, have to walk into the road to avoid the puddles. The surface of the tarmac is rutted and so the puddles in the tyre track ruts are also hazardous and make an additional obstacle to avoid when crossing/walking along the road.

When my wheelie bins were delivered it was decided by them that it would be too dangerous to stop on the corner & empty them. I was issued with bags, which the team pick up as they walk from one stop (nos 40, 38) to another (no 41). The bags are left in a corral at hand height so the men (or women) don't have to bend. However they are a potential health hazard as they encourage vermin and can get nibbled. Cats love to spray them.

Often the bins get missed on the Friday pick up and phone call reports rarely result on the bins being collected until after the weekend. No 41 have blamed me for their infestations of mice & rats in their loft. During all the time they have lived next door I have not had any bait taken from my loft. I also keep the household waste bag indoors to keep the risk of rodent-ripping down, but it is not always possible to keep rotten food in my fridge. During the snowy weather in February 2021, I had to take a broom to remove icy, water slush from the road; an additional hazard to get my medication.

Household necessities for living all have to be brought in my wheeled shopper twice a week. Inter-Covid-19-lockdowns I used paid services to get my shopping – sometimes as many as 6 double-trips across the road. Deliveries being impossible and the loss of the internet means I cannot order essential shopping. It was desperately awful to cope with

this. I had to transport shopping bags myself, using the helper to keep an eye on the road. During lockdown 3 a friend from Horsford has been bringing a weekly shop. I am desperately worried for her safety as she makes the journey from her car.

As I write today (10th March) it is my birthday I am 73 & have been unfit for work since 15/2/92 so my carer took me to the post office – first visit in 2021 – and we went through Horsford. I was appalled at the state of the road, the traffic levels, traffic lights. I cannot understand why there is application GNL264 [sic] for 45 new households since 2 new major developments recently finished/started have resulted in a new roundabout, increased traffic and a poor quality B road, although there are pavements on each side of the road more houses are unsound for the environment.

Felthorpe Street is being traffic calmed by introducing pinch points. I understood Taverham Road doesn't qualify, although the no (38.40.39) shows the road narrows and an early letter from the Area Engineer calls it a pinch point (38/40/39) letter in 1990s why can't this pinch point be reinstated?

Felthorpe Street pavements are not contiguous and to walk through the street involves much crossing of a busy C road. In case I forget to mention it in section 6, it would be a good idea to put zebra crossings for pedestrians at each artificial pinch point along the street. Horsford has zebra crossings including lights.

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11. A Health & Safety survey should be made along Taverham Road, particularly with respect to Yew Tree Cottage. It has been requested, but requests have been ignored.
12. The current situation discriminates against the disabled
13. The 1400 new houses build will include many amenities which Felthorpe has lost. We 300 residencies can no longer walk safely down the Taverham Road to the Reepham Road, which I used to do to catch the workers' bus. As well as reinstating our verges, a level pathway from there to the Reepham road should be made so we can again walk in safety to use amenities and facilities lost to Felthorpe.
14. 1400 new homes with primary school & medical facilities will be generating money. Some of this needs to be diverted into the local areas to make us safer from the traffic which will be generated.
15. There must be public toilet facilities on the site.

Please note, I have plenty of evidence of the 30 years correspondence in my efforts to improve the safety issues locally. However as a vulnerable OAP shielding from Covid I cannot without breaking the rules provide this evidence at this time.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Photographs - <https://oc2connect.gnlp.org.uk/a/4gn>

23256

Object

**Coltishall, Horstead etc., Settlement Map****Respondent:** Mr Paul Playford [17984]**Agent:** DJ Designs Ltd (Mr M J S Marshall) [19792]**Petition:** 2 petitioners**Summary:**

We have been made aware that our application for my clients land to be included in the Greater Norwich Local Plan as an acceptable site... has been initially rejected... / Our understanding is, that the site is unacceptable due to the access to the site from the highway not being acceptable to the Highway Department... / A planning application (Outline) was recently rejected on the same site using the same access for nine self-build houses.. ref 20200964 on the 14th August 2020... / Initially highways raised an objection to the proposal based on access, but once more details were supplied including confirmation that vision splay requirements and access compliance could be achieved, Highways withdrew their objections.. /The indicative scheme at outline showed that the site access could accommodate a Minor Access Road at 4.8m with a footpath at 1m... a Type 4 road in the Norfolk Residential design guide / the advice given at outline planning stage contradicts what we believe was earlier advice given to the GNLP board when they considered the application for inclusion of GNLP4048a and which led to the sites rejection (supporting documents are available)

**Change suggested by respondent:**

That site ref GNLP4048 be acceptable as a development site.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23767

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Mr Adrian Pohajdak [16384]**Summary:**

The proposed access is not safe, the road is small and goes through a housing estate which has many parked cars, it would be very dangerous to increase traffic on this road.

**Change suggested by respondent:**

Use one of the other proposed sites in foulsham which have much safer access.

**Legally** Yes**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

24163

Object

**Blofield, Settlement Map**

**Respondent:** Jack Pointer [19981]

**Summary:**

**Soundness**

There are four tests of soundness – whether the Local Plan has been positively prepared, and whether it is justified, effective and consistent with national policy.

**Positively prepared**

Positive preparation requires that it is based on a strategy which seeks to meet objectively assessed needs. We believe that, whilst this was true initially, the Plan has not been updated to take into account the short-term effects of the present pandemic and the long-term effects of social changes (including home working and an increased requirement for private outdoor space which will inevitably create growing demand for houses rather than flats).

It is not likely to be possible to quantify exactly what the net effect on need for houses at this point. However, bearing in mind that the proposed duration of the new Plan and the unlikely and inefficient possibility of an early review, a further buffer should be included to allow for this inevitable growth. It is suggested that a further 20% (reflecting statutory provision for past failures in delivery) would be an appropriate (although probably insufficient) first step towards minimising shortfall during the Plan period.

**Justified**

It is accepted that the consultation with (and participation of) the local community and other stakeholders has followed the statutory procedures.

However, as explained above, the Plan now needs to take into account the effects of the pandemic and evolving social change. In addition (and as explained in more detail below), the Plan has failed to allocate the site which best meets the requirements of national and local planning policy for the proposed housing growth in Blofield.

**Effective**

It is not possible to comment on the deliverability of the allocated sites or whether the owners are committed to delivering the housing proposed over the Plan period. It can be confirmed that there are no barriers to the delivery of the GNLP0252 site and that the owners of this site are committed to delivering new houses at the very earliest opportunity.

In so far as it is relevant when considering a Plan area as large and diverse as that within the GNDP, it is accepted that the Plan has been prepared in association with other local authorities and in accordance with their adopted Local Plans.

**Consistent with national policy**

Consistency with national policy is a matter of soundness (as well as a matter of legal compliance). Departures from national policy must be justified.

Previous representations have been made explaining in detail why site GNLP0252 complies much more closely with national and local planning policy and represents a much more suitable site for further housing growth in Blofield than the allocated GNLP2161 site. The site has been revised to take into account comments made earlier in the allocation process and the subsequent GNLP0252r site scores the same (2 amber and 12 green) in the same categories as the GNLP2161 site in the updated HELAA comparison table.

It is not proposed to repeat the previous representations made (in respect of GN0252/GNLP0252r) in full, but they should be taken in to account when considering this representation.

However, the following key points are worth repeating:

GNLP2161 is in existing commercial use and immediately adjacent to a busy retail use that opens seven days a week (including Bank Holidays). The HELAA assessment booklet for Blofield gives the Development Management comments on GNLP2161 as:

‘There is a potential conflict with the delivery and service yard for Norwich Camping and Leisure which needs to be considered should the site go forward for further assessment. The business is a local employer and provides a number of local services and it would not be good planning to compromise its ability to continue operating.’

In contrast, GNLP0252r is a quiet site surrounded on three sides by existing residential development and by open grassland to the remaining side.

There are significant uncertainties of scale of development, deliverability, and viability of the GNLP2161 site, whereas there is no uncertainty or impediments to rapid delivery of housing on GNLP0252r.

**Change suggested by respondent:**

However, the following key points are worth repeating:

GNLP2161 is in existing commercial use and immediately adjacent to a busy retail use that opens seven days a week (including Bank Holidays). The HELAA assessment booklet for Blofield gives the Development Management comments on GNLP2161 as:

'There is a potential conflict with the delivery and service yard for Norwich Camping and Leisure which needs to be considered should the site go forward for further assessment. The business is a local employer and provides a number of local services and it would not be good planning to compromise its ability to continue operating.'

In contrast, GNLP0252r is a quiet site surrounded on three sides by existing residential development and by open grassland to the remaining side.

There are significant uncertainties of scale of development, deliverability, and viability of the GNLP2161 site, whereas there is no uncertainty or impediments to rapid delivery of housing on GNLP0252r.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

## 23329

## Support

### Poringland, 5.49

**Respondent:** Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]

**Summary:**

Poringland Parish Council is pleased that the GNLP continues to include Framingham Earl, Framingham Pigot and well related parts of Bixley, Caistor St Edmund and Stoke Holy Cross when considering land use in the Poringland area, and defining such area as a key service centre. However, if the grouping of parishes is being considered in the planning permission process, it should be treated as a grouping for the whole development, including conditions and contributions.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23330

Support

**Poringland, 5.50****Respondent:** Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]**Summary:**

Poringland Parish Council supports no new residential allocations being carried forwards, and is accepting of the 547 developments with planning permission and the area POR3 for employment land. The allocations for employment land should be retained as such a usage. As the existing allocations are so high, the Parish Council would like to see a model for the trajectory of delivery locally, as there is no desire to see the land banked.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23331

Object

**Poringland, 5.51****Respondent:** Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]**Summary:**

We feel the wording here is quite weak and could quite easily be contradicted with the proposed changes to the NPPF. The proposed changes to environmental sustainability state to protect and enhance the environment and improve biodiversity. Section 5.51 only refers to the protection.

**Change suggested by respondent:**

The proposed changes to environmental sustainability state to protect and enhance the environment and improve biodiversity. Section 5.51 only refers to the protection.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23332

Support

**Policy POR3, POR 3 Policy****Respondent:** Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]**Summary:**

Poringland Parish Council supports the matters that the development would be expected to address, however, would like the following added.

- Prior to development, a traffic analysis, particularly at peak times, to be conducted for both private vehicles and commercial deliveries and mitigation to be put in place to ensure highway safety.
- A construction management plan to be in place prior to development to ensure minimum inconvenience to those living close by.
- Review of pathways and cycleways to the site to encourage local people to attend this place of employment without using motorised vehicles.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23234

Object

**Site Assessment Booklets and Studies, Village Clusters – Broadland Assessment Booklets****Respondent:** Mr Shaun Powley [19764]**Summary:**

Properties on Dog Lane and Coltsfoot Road in Horsford were flooded recently as a result of increased pressure on the nearby Beck from the new Northern Distributor Road. My concern is that a new housing plot in the same area will put further pressure on the Beck and increase the flood risk further. Norfolk County Council have launched a formal investigation into the recent flooding and we are awaiting their report. The findings of the report should be considered before the plans for a new residential plot in the same area can be considered sound.

**Change suggested by respondent:**

Any drainage or run-off of surface water in the Horsford area must be considered as the Beck has shown recently that it cannot cope with increased volumes. If the drainage from the Northern Distributor Road was diverted away from the houses on Dog Lane and Coltsfoot Road then perhaps the problem would be sufficiently reduced.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24131

Object

**Policy 1048R, 1048R Policy****Respondent:** PPAP Investments Ltd [20051]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Petition:** 2 petitioners**Summary:**

Land at Dawsons Lane GNLP2080 is eminently deliverable, in accordance with the NPPF and should be allocated in the plan within Blofield Heath.

As such, by doing so, the plan will be more effective.

See supporting letter and appendices.

**Change suggested by respondent:**

The following policy should be included within the plan:

Land at Dawsons Lane, Blofield Heath is allocated for residential development. The site is likely to accommodate a minimum of 15 homes.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Appendix 2 - Reps GNLP2080 March 2020 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4vs>  
Appendix 3 20200345 dwg. No. 103-19\_0450\_C6 Amended site plan.pdf - <https://oc2connect.gnlp.org.uk/a/4vt>  
Dawsons Lane Representations to GNLP - March 2021 (Reg 19).pdf - <https://oc2connect.gnlp.org.uk/a/4v3>

24132

Object

**Rackheath, Settlement Map****Respondent:** PPAP Investments Ltd [20051]**Agent:** Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]**Petition:** 2 petitioners**Summary:**

Land at Salhouse Road GNLP2166 should be allocated in the plan within Rackheath.

As such, by doing so, it will assist in the early delivery of new homes which will make the plan be more effective.

See supporting letter and appendices.

**Change suggested by respondent:**

Please note above at 5.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Appendix 1 - GNLP 2166 March 2020 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4v4>  
Salhouse Rd Representations to GNLP - March 2021 (Reg 19).pdf - <https://oc2connect.gnlp.org.uk/a/4v5>

23544

Object

**Environment, 145****Respondent:** Mr Patrick Prekopp [19860]**Summary:**

Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to ensure new development is adapted to a changed climate'. To achieve this in Aylsham, extra housing would have to meet carbon neutral standards to ensure greater efficiency in water and energy usage.

As there is no evidence to justify this statement, the Plan fails on legal compliance and soundness in approach.

**Change suggested by respondent:**

The Plan should be discarded as it does not comply with national policy targets and is not positively prepared, justified, or compliant under the GNLP's own Environment objectives.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23570

Object

**Aylsham, 4.3****Respondent:** Mr Patrick Prekopp [19860]**Summary:**

Policies 2 and 4 support the further development of low carbon transport networks.

In respect to Aylsham, building more houses means more roads encouraging more car use and raising carbon emissions from transport. There are no firm proposals to show where or how in Reg 19 this would be mitigated.

Two large housing estate developments in the town have only just been completed and infrastructure issues arising from them have yet to be resolved, including school capacity, car parking provision and traffic management.

**Change suggested by respondent:**

Reg 19 should be abandoned as the need to address Climate Change in line with national policies has not been fully met by the GNLP.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23596

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr Patrick Prekopp [19860]**Summary:**

The opportunity to address climate change - including "reducing the need to travel and promoting the use of sustainable transport modes; maintaining and enhancing water quality and other sustainability measures - is not taken with respect to Aylsham.

To make Reg 19 sound, the location of the second site should address the significant issues for infrastructure and, as a consequence, the associated needs resulting from climate change. There are no specific measures identified in the plan. Nor does it include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations.

**Change suggested by respondent:**

The second site for Aylsham should be withdrawn. There are no firm proposals to ensure that a second site would meet the needs of the community in terms of environmental benefits. Indeed, proposed sites like this in unsustainable rural locations, where there is poor access to public transport and local jobs, and a reliance on private cars, as well as delivery vehicles to support these new dwellings, should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23754

Object

**Aylsham, Settlement Map****Respondent:** Mr Patrick Prekopp [19860]**Summary:**

The GNLP prioritises economic growth and development without putting the additional legal requirements of climate change at the centre. Para. 158 states that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038'. What it should be stating is that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

**Change suggested by respondent:**

The GNLP's Climate Change Statement must include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23473

Object

**Aylsham, 352****Respondent:** Mr Richard Preston [19055]**Summary:**

No consultation has taken place with Aylsham Town Council between Regulation 18 and Regulation 19 on the approximate doubling of the number of planned dwellings in the town; also that there have been no discussions of this in full Broadland Council session within the period. Major decisions have been restricted to Cabinet meetings.

The proposal to assign 550 new houses to Aylsham will provide many challenges and will exacerbate the infrastructure issues which have resulted from the recently completed developments in the town, including school capacity, car parking provision and traffic management.

**Change suggested by respondent:**

The Greater Norwich Infrastructure Plan (GNIP) fails to make any reference to Aylsham, other than to acknowledge it as a 'main town'. Inclusion of an allocation of a further 550 houses should be conditional on a full assessment for Aylsham in GNIP terms of 'Major Housing Growth Associated Facilities' and a 'Bus Rapid Transport' Corridor'.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24438

Object

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**Aylsham, Settlement Map****Respondent:** Mrs Angela Quinn [19537]**Summary:**

I wish to register my strong disapproval of the cavalier way with which Reg 19 of the proposed Aylsham plan has been included without warning or consultation with the Parish Council and/or the residents of Aylsham. This is absolutely not acceptable, Particularly in view of the approved development (Egg 18) and the extra impact on the town's infrastructure - which is already overburdened . Should Reg 19 be approved, the thought of both being built at the same time almost beggars belief, the disruption to the normal life of the town would be terrible.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24088

Object

**Taverham, Settlement Map****Respondent:** R Brereton Ltd [20046]**Agent:** Mr Magnus Magnusson [14502]**Petition:** 2 petitioners**Summary:**

My client's site ought to be included in the GNLP as an allocation. My client's site, referenced GNLP4014 (land east of Fir Covert Road, Taverham) is demonstrably 'suitable' as evidenced by the HELAA (Taverham & Ringland 'booklet', p.37 - Stage 2 HELAA Comparison table). Furthermore, this site is available, achievable and deliverable (and viable). The site can (potentially) accommodate both residential and/or economic development.

We contend that our client's site (GNLP4014) should be allocated in the GNLP to ensure that it meets the tests of 'soundness' as set out in the National Planning Framework in the following respects:

- Positively prepared – To ensure an appropriate growth strategy for the Urban Area/Fringe (and the wider sub-region) that meets objectively assessed needs and provides sufficient flexibility to respond to any unmet needs from neighbouring areas/Authorities.
- Justified – Provides an appropriate strategy that is commensurate with the Urban Area/Fringe's status in the 'Spatial Strategy' (Policy 1) and takes into account a site that is demonstrably 'suitable' (sustainable) as evidenced by the HELAA process.
- Effective – Ensuring the GNLP includes a site allocation for the Urban Area/Fringe (Taverham) that is demonstrably deliverable within the plan period.
- Consistent with national policy – Meeting the 'tests' of the Framework insofar as plan-making is concerned including the requirements that plans are positively prepared and contain sufficient flexibility to respond to rapid changes in circumstance.

**Change suggested by respondent:**

Inclusion of site GNLP4014 within the GNLP as an allocation (residential and/or economic development) for the reasons outlined at section 5 above.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None



24089

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** R Brereton Ltd [20046]

**Agent:** Mr Magnus Magnusson [14502]

**Petition:** 2 petitioners

### Summary:

My client's site ought to be included in the GNLP as an allocation. My client's site, referenced GNLP4014 (land east of Fir Covert Road, Taverham) is demonstrably 'suitable' as evidenced by the HELAA (Taverham & Ringland 'booklet', p.37 - Stage 2 HELAA Comparison table). Furthermore, this site is available, achievable and deliverable (and viable). The site can (potentially) accommodate both residential and/or economic development.

We contend that our client's site (GNLP4014) should be allocated in the GNLP to ensure that it meets the tests of 'soundness' as set out in the National Planning Framework in the following respects:

- Positively prepared – To ensure an appropriate growth strategy for the Urban Area/Fringe (and the wider sub-region) that meets objectively assessed needs and provides sufficient flexibility to respond to any unmet needs from neighbouring areas/Authorities.
- Justified – Provides an appropriate strategy that is commensurate with the Urban Area/Fringe's status in the 'Spatial Strategy' (Policy 1) and takes into account a site that is demonstrably 'suitable' (sustainable) as evidenced by the HELAA process.
- Effective – Ensuring the GNLP includes a site allocation for the Urban Area/Fringe (Taverham) that is demonstrably deliverable within the plan period.
- Consistent with national policy – Meeting the 'tests' of the Framework insofar as plan-making is concerned including the requirements that plans are positively prepared and contain sufficient flexibility to respond to rapid changes in circumstance.

### Change suggested by respondent:

Inclusion of site GNLP4014 within the GNLP as an allocation (residential and/or economic development) for the reasons outlined at section 5 above.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23794

Object

**Housing, 52****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

- Rackheath has already had a considerable number of sites allocated as part of the 5 year land supply and we would not like to see additional sites being added whilst so much of the allocated land is awaiting development.

**Change suggested by respondent:**

- o Existing sites should be fulfilled before new ones are allocated.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23801

Support

**Health and Welbeing, 46****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

- o Medical provisions must be able to accommodate the community growth and be available within Rackheath.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23805

Support

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**Landscape, 118**

**Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]

**Summary:**

• Landscape buffers should be protected and retained, including:

- o Tree belts
- o Woodland

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23807

Support

---

**Communities, 132**

**Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]

**Summary:**

• Any new community facilities (GNLP 1060) should be offered within the remit of the Parish Council to ensure new facilities work in harmony with those in existence and remain viable and sustainable.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23810

Support

**Introduction, 198****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

- Housing developments should abide by the Rackheath Neighbourhood Plan. All future developments should respect the character of Rackheath/location of development and will be required to work towards retaining a rural feel, therefore no 3 storey houses will be accepted.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23796

Object

**Health and Welbeing, 46****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

- Rackheath continues to be the focus of housing development and it is imperative that the bigger picture is considered in relation to infrastructure, services and connectivity to ensure that the existing Rackheath community is not impacted by this large scale development

**Change suggested by respondent:**

- o Medical provisions must be able to accommodate the community growth and be available within Rackheath.

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23798

Support

**Education and Social Mobility, 75****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

- Rackheath continues to be the focus of housing development and it is imperative that the bigger picture is considered in relation to infrastructure, services and connectivity to ensure that the existing Rackheath community is not impacted by this large scale development. Educational capacity must be increased to ensure community can grow seamlessly and to ensure new developments integrate successfully.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23799

Support

**The Cycle Network, 88****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

- o Connectivity of infrastructure needs to be addressed.
- ☒ Footpaths around the village do not currently link up well and access to neighbouring villages, communities and facilities is difficult. E.g.
  - no safe footpath to Salhouse or Salhouse Station.
  - no footpath/cycle path connectivity to Great Plumstead.
  - no footpath/cycle path available to Sprowston and on to Norwich
- ☒ Whilst "leisure routes" in the green corridors are being addressed, these are not necessarily suitable for commuting and only run parallel to the NDR and do not follow the spine roads into Norwich and other employment sites.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23804

Support

**Transport for Norwich and the Transforming Cities Programme, 89****Respondent:** Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]**Summary:**

Direct, fast routed public transport to Norwich and the Wroxham should be in place early 2021 to ensure developments can be sustainable and to meet climate change objectives – we must promote the use of public transport to our existing community and to those moving into new developments.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24306

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Rampton Property Trust [18723]**Agent:** Bidwells (Mr Darren Cogman, LP Contact) [12857]**Summary:**

As outlined in this representation it is evident that site GNLP2176 was a Preferred site for allocation at the Reg.18(C) stage of the plan preparation process, 'based on the additional work done on school bus routes'. Page 4 However, in conjunction with the current Reg.19 consultation the site is now not considered appropriate for allocation. However, it seems apparent that there is no clear or justified rationale for this change in stance, save for what would appear to be the quantum of objections (principally public) to the Reg.18(C) consultation itself. Any issues raised as reasons for deallocating the site can be addressed. As evidenced by the Reg.18(C) consultation.

See attachment for further details of the representation

**Change suggested by respondent:**

As fully explored and demonstrated within Question 5 above, GNLP Site GNLP2176 at Honingham should be reinstated into the Greater Norwich Local Plan, as in accordance with Policy 1 (The Sustainable Growth Strategy) and Policy 7.1 (The Norwich Urban Area including the fringe parishes) it represents a sustainable site.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/4ds>

23698

Object

**Policy 0133E, 0133E Map****Respondent:** Miss Dee Randell [15466]**Summary:**

Loss of recreational areas, such as woods and paths, to accommodation buildings. Loss of wildlife that inhabits the wooded areas that will be destroyed. Lack of access to the Yare Valley green corridor while building works are ongoing. Disruption to the wider wildlife that lives near those areas.

Greater numbers of students, putting pressure on local amenities, roads and green space.

**Change suggested by respondent:**

Removal of building works in this area of the Yare Valley. Protection of wildlife and trees and the green space. Protection of the green corridor to the Yare Valley.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23704

Object

**Policy 0133DR, 0133DR Map****Respondent:** Miss Dee Randell [15466]**Summary:**

Loss of recreational areas, such as woods, fields and paths, to accommodation buildings. Loss of wildlife that inhabits the wooded areas that will be destroyed. Lack of access to the Yare Valley green corridor while building works are ongoing. Disruption to the wider wildlife that lives near those areas.

Greater numbers of students, putting pressure on local amenities, roads and green space. Private housing will see more student let, meaning more cars on local roads and estates, more noise and disturbance.

**Change suggested by respondent:**

Stop building on green space. Stop expanding the university accommodation at the expense of the green belt and local communities.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23571

Object

**Wymondham, 4.62****Respondent:** Mrs Janis Raynsford [13526]**Summary:**

Planning policies have helped to protect the separate identities of Wymondham thus far but Policy GNLP0354R seeks to destroy this unique rural part of Wymondham. Likewise GNLP0320 - land south of Gonville Hall; both will harm views of the Abbey. I have made full comments on the downloaded form including those of Wymondham Heritage Society.

**Change suggested by respondent:**

These development proposals would cause significant adverse impact on the distinctive landscape characteristics. Please delete these policies from the draft GNLP.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23572

Object

**Wymondham, 4.64****Respondent:** Mrs Janis Raynsford [13526]**Summary:**

GNLP0354R - land at Johnsons Farm. This policy would harm/destroy the rural gateway to Wymondham from the west meaning the Grade I Wymondham Abbey would only be seen obliquely through housing. The land is elevated and further building would effectively destroy the current views and compromise the exceptional Grade I listed Cavick House and ancillary buildings which create one of the most significant groups of historic buildings in the Conservation Area. I have made comments against this policy in more detail on a downloaded form.

**Change suggested by respondent:**

This policy is unsound and should be removed from the draft GNLP. It will have a totally detrimental effect on this part of Wymondham; the site is encompassed by narrow lanes and would severely urbanise the historic western approach to the Abbey and compromise the rural character of the landscape in general.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



23573

Object

**Wymondham, 4.56****Respondent:** Mrs Janis Raynsford [13526]**Summary:**

Object GNLP0320 - land south of Gonville Hall West of Sutton Lane, east of London Road and north of Sawyers Lane - 500 Detrimental to the proximity of Grade II listed Gonville Hall. Permission for 335 houses nearby. I agree that this site should not be considered for further development which would be totally unacceptable. The landowner's opinion that the same constraints apply to this site as for the nearby 335 housing site is disingenuous. I agree that it is an unreasonable alternative.

**Change suggested by respondent:**

The housing development for 335 houses - Williams Park - has already despoiled a good agricultural landscape. This policy will only serve to compound the massive effect of housing when approaching Wymondham from the south. This policy should be removed from the draft GNLP.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23614

Object

**Policy 0354R, 0354R Policy****Respondent:** Mrs Janis Raynsford [13526]**Summary:**

There is absolutely no justification for further development in this part of Wymondham. This proposed development will absolutely do nothing to conserve and enhance this landscape character; it will totally destroy this hitherto tranquil environment and, the site being elevated, housing will be seen for miles around.

Development Management 4.5. Landscape Character and River Valleys :

"All development should respect, conserve and where possible enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused".

**Change suggested by respondent:**

To remove this Policy GNLP0354R from the GNLP.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23696

Object

**Wymondham, 4.60****Respondent:** Mrs Janis Raynsford [13526]**Summary:**

GNLP0006 - land to the north of Tuttlles Lane East. This represents a huge and unacceptable conurbation in the Tuttlles Lane area to include GNLP0525 and GNLP2155 and completely surrounding GNLP3013 and 2014/0799. Any development would totally urbanise this hitherto unspoilt and natural landscape and would be highly visible over a considerable distance.

**Change suggested by respondent:**

I believe GNLP0006 to be unsound and it is wrong to state that "development would not impact on the designated landscape".

It will intrude into the open countryside thus destroying the boundary of the built-up area.

This is not a Reasonable Alternative Site.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23824

Object

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**Reedham, Settlement Map**

**Respondent:** Reedham Parish Council (Mrs Claudia Dickson, Clerk) [12966]

**Summary:**

Reedham Parish Council do not believe the GNLP meets the 'soundness' test. Policy 2, issue 1, and Policy 7.4, item 386, both state that sites must have safe access and/or route to schools, amongst other local facilities. Neither of the 2 sites proposed provide safe access to the local primary school. GNLP1001 acknowledges 'it is not possible to provide an off-carriageway pedestrian footway for the whole route to Reedham Primary School'. GNLP3003 also states 'it is not possible to provide an off-carriageway pedestrian footway to the school'. Therefore neither site should be put forward for inclusion in the final submission.

**Change suggested by respondent:**

There should be consistency in allocating sites. If they do not meet the criteria set out in the policy document they should not be included. The GNLP cannot state a policy but then pick and choose whether to implement it or not. This will leave it open to developers arguing that why is this site allowed but that one not if the same policy is applied to one but not the other. And equally does not allow security for residents in the GNLP area to know that the policies laid down will be consistently applied.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24056

Object

**Policy 0337R, 0337R Policy****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Not legally compliant

The approach taken in the assessment of sites and referred to in various site assessment booklets does not represent a transparent, objective or evidence based approach. The GNDP has failed to properly comply with its legal obligation to assess the Reasonable Alternatives on a comparative basis, having regard to a transparent and objective evidence, as is required by The Strategic Environmental Appraisal Directive 2001. (reference Legal Opinion at Appendix 1 of separate attached representation document).

cc Representation report document

**Change suggested by respondent:**

The GNDP should prepare proportionate evidence, properly informed by a Sustainability Appraisal and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNL0332R and GNL0334R as either allocated sites or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Response GNL0332R 0334R - <https://oc2connect.gnlp.org.uk/a/487>

24057

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Not legally compliant

The approach taken in the assessment of sites and referred to in various site assessment booklets does not represent a transparent, objective or evidence based approach. The GNDP has failed to properly comply with its legal obligation to assess the Reasonable Alternatives on a comparative basis, having regard to a transparent and objective evidence, as is required by The Strategic Environmental Appraisal Directive 2001. (reference Legal Opinion at Appendix 1 of separate attached representation document).

cc Representation report document

**Change suggested by respondent:**

The GNDP should prepare proportionate evidence, properly informed by a Sustainability Appraisal and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNL0332R and GNL0334R as either allocated sites or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Response GNL0332R 0334R - <https://oc2connect.gnlp.org.uk/a/487>

24058

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Not legally compliant

The approach taken in the assessment of sites and referred to in various site assessment booklets does not represent a transparent, objective or evidence based approach. The GNDP has failed to properly comply with its legal obligation to assess the Reasonable Alternatives on a comparative basis, having regard to a transparent and objective evidence, as is required by The Strategic Environmental Appraisal Directive 2001. (reference Legal Opinion at Appendix 1 of separate attached representation document).

cc Representation report document

**Change suggested by respondent:**

The GNDP should prepare proportionate evidence, properly informed by a Sustainability Appraisal and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNL0332R and GNL0334R as either allocated sites or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Response GNL0332R 0334R - <https://oc2connect.gnlp.org.uk/a/487>

24060

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Not effective

A plan preparation uninformed by the anticipated rate of developemnt for specific sites and instead based on an average of past delivery rates on different sites with entirely different issues at a different time with different economic and social circumstances is likely to be unsound and is certainly not transparent and tested for its ability to deliver sufficient houses within the plan period. In our view, this is particularly important where a plan such the GNLP seeks to supply a large number of homes on large scale development formats. As stated in paragraph 72 of the Framework, in identifying large scale development, authorities should "make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites...."

cc See seperate attached representation document (Reg19)

**Change suggested by respondent:**

In view of the concerns and to ensure that the plan is effective and sound under this test we recommend that:

- a) evidence should be produced to define, explain and allow proper testing of the anticipated delivery rates of all committed and allocated sites. This would be in accordance with advice contained in paragraph 72 of the Framework.
- b) Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. This would be in accordance with advice contained in paragraph 68 of the Framework which confirms how small and medium sized sites can make an important contribution to meeting the housing requirement of an area.
- c) Additional contingency sites should be identified to provide greater assurance that additional allocations could be made and delivered quickly if housing delivery in the plan area fell short of expectation. As with additional allocations referred to in b) above additional contingency sites should include small and medium sized sites sufficient to make a material impact on delivery and capable of quick delivery and build-out.
- d) Alternatively, other contingency sites should be identified to replace the Costessey contingency site referred to in Policy GNLP0581/2043. The site is not considered to be justified and suitable for development and, in any event, is unlikely to be delivered quickly given the substantial necessary and in some cases uncertain improvements and mitigation

**Legally** No**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** Submission - <https://oc2connect.gnlp.org.uk/a/488>

24059

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** RG Carter & Drayton Farms Limited [20044]

**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]

**Petition:** 2 petitioners

### Summary:

Not effective

A plan preparation uninformed by the anticipated rate of development for specific sites and instead based on an average of past delivery rates on different sites with entirely different issues at a different time with different economic and social circumstances is likely to be unsound and is certainly not transparent and tested for its ability to deliver sufficient houses within the plan period. In our view, this is particularly important where a plan such the GNLP seeks to supply a large number of homes on large scale development formats. As stated in paragraph 72 of the Framework, in identifying large scale development, authorities should "make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites...."

cc See seperate attached representation document (Reg19)

### Change suggested by respondent:

In view of the concerns and to ensure that the plan is effective and sound under this test we recommend that:

- a) evidence should be produced to define, explain and allow proper testing of the anticipated delivery rates of all committed and allocated sites. This would be in accordance with advice contained in paragraph 72 of the Framework.
- b) Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. This would be in accordance with advice contained in paragraph 68 of the Framework which confirms how small and medium sized sites can make an important contribution to meeting the housing requirement of an area.
- c) Additional contingency sites should be identified to provide greater assurance that additional allocations could be made and delivered quickly if housing delivery in the plan area fell short of expectation. As with additional allocations referred to in b) above additional contingency sites should include small and medium sized sites sufficient to make a material impact on delivery and capable of quick delivery and build-out.
- d) Alternatively, other contingency sites should be identified to replace the Costessey contingency site referred to in Policy GNLP0581/2043. The site is not considered to be justified and suitable for development and, in any event, is unlikely to be delivered quickly given the substantial necessary and in some cases uncertain improvements and mitigation

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Submission - <https://oc2connect.gnlp.org.uk/a/488>



24061

Object

**Policy 0337R, 0337R Policy****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Not effective

A plan preparation uninformed by the anticipated rate of developemnt for specific sites and instead based on an average of past delivery rates on different sites with entirely different issues at a different time with different economic and social circumstances is likely to be unsound and is certainly not transparent and tested for its ability to deliver sufficient houses within the plan period. In our view, this is particularly important where a plan such the GNLP seeks to supply a large number of homes on large scale development formats. As stated in paragraph 72 of the Framework, in identifying large scale development, authorities should "make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites...."

cc See seperate attached representation document (Reg19)

**Change suggested by respondent:**

In view of the concerns and to ensure that the plan is effective and sound under this test we recommend that:

- a) evidence should be produced to define, explain and allow proper testing of the anticipated delivery rates of all committed and allocated sites. This would be in accordance with advice contained in paragraph 72 of the Framework.
- b) Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. This would be in accordance with advice contained in paragraph 68 of the Framework which confirms how small and medium sized sites can make an important contribution to meeting the housing requirement of an area.
- c) Additional contingency sites should be identified to provide greater assurance that additional allocations could be made and delivered quickly if housing delivery in the plan area fell short of expectation. As with additional allocations referred to in b) above additional contingency sites should include small and medium sized sites sufficient to make a material impact on delivery and capable of quick delivery and build-out.
- d) Alternatively, other contingency sites should be identified to replace the Costessey contingency site referred to in Policy GNLP0581/2043. The site is not considered to be justified and suitable for development and, in any event, is unlikely to be delivered quickly given the substantial necessary and in some cases uncertain improvements and mitigation

**Legally** No**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** Submission - <https://oc2connect.gnlp.org.uk/a/488>

24064

Object

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** RG Carter & Drayton Farms Limited [20044]

**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]

**Petition:** 2 petitioners

### Summary:

Unsound - Not justified

The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337, identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R.

See separate attached representation document (Reg19) and evidence from Reg 18 stage.

### Change suggested by respondent:

We recommend that:

- a) proportionate evidence, properly informed by Sustainability Appraisal should be prepared and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNLP0332R and GNLP0334R as either allocated sites or contingency sites.
- b) Subject to evidence and consultation, the GNLP could elect to allocate or identify both sites GNLP0332R and GNLP0334R for development or contingency, as alternatives to presently allocated or identified contingency sites or as additional allocated or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Submission Document GNLP0332R GNLP0334R - <https://oc2connect.gnlp.org.uk/a/48v>  
 Supplementary Statement - <https://oc2connect.gnlp.org.uk/a/48b>  
 TECHNICAL BRIEFING NOTE - <https://oc2connect.gnlp.org.uk/a/48c>  
 Aircraft Noise Assessment - <https://oc2connect.gnlp.org.uk/a/48d>  
 Landscape Report rev P3 - <https://oc2connect.gnlp.org.uk/a/48w>  
 Landscape and Visual Appraisal rev P1 - <https://oc2connect.gnlp.org.uk/a/48f>  
 Reg 18 C Rep - <https://oc2connect.gnlp.org.uk/a/48g>  
 SURFACE WATER DRAINAGE STRATEGY - <https://oc2connect.gnlp.org.uk/a/48h>  
 ACCESS AND TRANSPORTATION STRATEGY - <https://oc2connect.gnlp.org.uk/a/48x>  
 TREE SURVEY & CONSTRAINTS PLAN - <https://oc2connect.gnlp.org.uk/a/48j>  
 Plan 2 - <https://oc2connect.gnlp.org.uk/a/48k>  
 Plan 1 - <https://oc2connect.gnlp.org.uk/a/48z>  
 Bird Hazard Risk Assessment and Management Plan - <https://oc2connect.gnlp.org.uk/a/48m>  
 The Monitoring and Management of Gulls on Commercial and Industrial Buildings in the Vicinity of Norwich International Airport - <https://oc2connect.gnlp.org.uk/a/48n>  
 Ecology: Preliminary Ecological Appraisal - <https://oc2connect.gnlp.org.uk/a/48y>  
 Heritage Desk Based Assessment - <https://oc2connect.gnlp.org.uk/a/48p>

24065

Object

**Appendices, Appendix 6 Housing delivery trajectory****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Unsound - Not justified

The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337, identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R.

See separate attached representation document (Reg19) and evidence from Reg 18 stage.

**Change suggested by respondent:**

We recommend that:

- a) proportionate evidence, properly informed by Sustainability Appraisal should be prepared and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNLP0332R and GNLP0334R as either allocated sites or contingency sites.
- b) Subject to evidence and consultation, the GNDDP could elect to allocate or identify both sites GNLP0332R and GNLP0334R for development or contingency, as alternatives to presently allocated or identified contingency sites or as additional allocated or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Submission Document GNLP0332R GNLP0334R - <https://oc2connect.gnlp.org.uk/a/48v>  
 Supplementary Statement - <https://oc2connect.gnlp.org.uk/a/48b>  
 TECHNICAL BRIEFING NOTE - <https://oc2connect.gnlp.org.uk/a/48c>  
 Aircraft Noise Assessment - <https://oc2connect.gnlp.org.uk/a/48d>  
 Landscape Report rev P3 - <https://oc2connect.gnlp.org.uk/a/48w>  
 Landscape and Visual Appraisal rev P1 - <https://oc2connect.gnlp.org.uk/a/48f>  
 Reg 18 C Rep - <https://oc2connect.gnlp.org.uk/a/48g>  
 SURFACE WATER DRAINAGE STRATEGY - <https://oc2connect.gnlp.org.uk/a/48h>  
 ACCESS AND TRANSPORTATION STRATEGY - <https://oc2connect.gnlp.org.uk/a/48x>  
 TREE SURVEY & CONSTRAINTS PLAN - <https://oc2connect.gnlp.org.uk/a/48j>  
 Plan 2 - <https://oc2connect.gnlp.org.uk/a/48k>  
 Plan 1 - <https://oc2connect.gnlp.org.uk/a/48z>  
 Bird Hazard Risk Assessment and Management Plan - <https://oc2connect.gnlp.org.uk/a/48m>  
 The Monitoring and Management of Gulls on Commercial and Industrial Buildings in the Vicinity of Norwich International Airport - <https://oc2connect.gnlp.org.uk/a/48n>  
 Ecology: Preliminary Ecological Appraisal - <https://oc2connect.gnlp.org.uk/a/48y>  
 Heritage Desk Based Assessment - <https://oc2connect.gnlp.org.uk/a/48p>

24066

Object

**Policy 0337R, 0337R Policy****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Unsound - Not justified

The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337, identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R.

See separate attached representation document (Reg19) and evidence from Reg 18 stage.

**Change suggested by respondent:**

We recommend that:

- a) proportionate evidence, properly informed by Sustainability Appraisal should be prepared and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNLP0332R and GNLP0334R as either allocated sites or contingency sites.
- b) Subject to evidence and consultation, the GNDDP could elect to allocate or identify both sites GNLP0332R and GNLP0334R for development or contingency, as alternatives to presently allocated or identified contingency sites or as additional allocated or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Submission Document GNLP0332R GNLP0334R - <https://oc2connect.gnlp.org.uk/a/48v>  
 Supplementary Statement - <https://oc2connect.gnlp.org.uk/a/48b>  
 TECHNICAL BRIEFING NOTE - <https://oc2connect.gnlp.org.uk/a/48c>  
 Aircraft Noise Assessment - <https://oc2connect.gnlp.org.uk/a/48d>  
 Landscape Report rev P3 - <https://oc2connect.gnlp.org.uk/a/48w>  
 Landscape and Visual Appraisal rev P1 - <https://oc2connect.gnlp.org.uk/a/48f>  
 Reg 18 C Rep - <https://oc2connect.gnlp.org.uk/a/48g>  
 SURFACE WATER DRAINAGE STRATEGY - <https://oc2connect.gnlp.org.uk/a/48h>  
 ACCESS AND TRANSPORTATION STRATEGY - <https://oc2connect.gnlp.org.uk/a/48x>  
 TREE SURVEY & CONSTRAINTS PLAN - <https://oc2connect.gnlp.org.uk/a/48j>  
 Plan 2 - <https://oc2connect.gnlp.org.uk/a/48k>  
 Plan 1 - <https://oc2connect.gnlp.org.uk/a/48z>  
 Bird Hazard Risk Assessment and Management Plan - <https://oc2connect.gnlp.org.uk/a/48m>  
 The Monitoring and Management of Gulls on Commercial and Industrial Buildings in the Vicinity of Norwich International Airport - <https://oc2connect.gnlp.org.uk/a/48n>  
 Ecology: Preliminary Ecological Appraisal - <https://oc2connect.gnlp.org.uk/a/48y>  
 Heritage Desk Based Assessment - <https://oc2connect.gnlp.org.uk/a/48p>

24067

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** RG Carter & Drayton Farms Limited [20044]**Agent:** CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]**Petition:** 2 petitioners**Summary:**

Unsound - Not justified

The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337, identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R.

See separate attached representation document (Reg19) and evidence from Reg 18 stage.

**Change suggested by respondent:**

We recommend that:

- a) proportionate evidence, properly informed by Sustainability Appraisal should be prepared and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNLP0332R and GNLP0334R as either allocated sites or contingency sites.
- b) Subject to evidence and consultation, the GNLP could elect to allocate or identify both sites GNLP0332R and GNLP0334R for development or contingency, as alternatives to presently allocated or identified contingency sites or as additional allocated or contingency sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Submission Document GNLP0332R GNLP0334R - <https://oc2connect.gnlp.org.uk/a/48v>

Supplementary Statement - <https://oc2connect.gnlp.org.uk/a/48b>

TECHNICAL BRIEFING NOTE - <https://oc2connect.gnlp.org.uk/a/48c>

Aircraft Noise Assessment - <https://oc2connect.gnlp.org.uk/a/48d>

Landscape Report rev P3 - <https://oc2connect.gnlp.org.uk/a/48w>

Landscape and Visual Appraisal rev P1 - <https://oc2connect.gnlp.org.uk/a/48f>

Reg 18 C Rep - <https://oc2connect.gnlp.org.uk/a/48g>

SURFACE WATER DRAINAGE STRATEGY - <https://oc2connect.gnlp.org.uk/a/48h>

ACCESS AND TRANSPORTATION STRATEGY - <https://oc2connect.gnlp.org.uk/a/48x>

TREE SURVEY & CONSTRAINTS PLAN - <https://oc2connect.gnlp.org.uk/a/48j>

Plan 2 - <https://oc2connect.gnlp.org.uk/a/48k>

Plan 1 - <https://oc2connect.gnlp.org.uk/a/48z>

Bird Hazard Risk Assessment and Management Plan - <https://oc2connect.gnlp.org.uk/a/48m>

The Monitoring and Management of Gulls on Commercial and Industrial Buildings in the Vicinity of

Norwich International Airport - <https://oc2connect.gnlp.org.uk/a/48n>

Ecology: Preliminary Ecological Appraisal - <https://oc2connect.gnlp.org.uk/a/48y>

Heritage Desk Based Assessment - <https://oc2connect.gnlp.org.uk/a/48p>

23609

Object

**Policy 0354R, 0354R Policy****Respondent:** Ms Cecilia Riccardi [14061]**Summary:**

The purpose of my suggested amendments is to provide clarity as to the actual access and exit points to the site, especially as matters of access are usually determined at the early stages of the planning process . This avoids any confusion and ambiguity especially as in this case there are two London Roads, the B1172 and the Old London Road.

**Change suggested by respondent:**

To ensure the policy issue itself is sound:

Point 2: Please consider replacing this so that it echoes the wording above, as in:

"Vehicular access from the B1172 London Road and the Old London Road via the to be built roundabout, with a minimum 5.0 metre carriageway width, and 2.0 metre footway provision across the site frontage. Consideration to be given whether a footway should stretch the length of the site to the new roundabout junction.

Point 5: Please consider removing "Abbey Road or" from this sentence.

Additional Point: To ensure further soundness could the actual access point to the site be clarified. There is an argument for siting it at the widest frontage point as this disrupts the least number of households in Old London Road.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23608

Object

**Policy 0354R, 4.65****Respondent:** Ms Cecilia Riccardi [14061]**Summary:**

The purpose of this contribution is to suggest improvement of the soundness of the access proposals for this site. As matters of access are often dealt with at an early stage of the planning process clarification is important and helps avoid any ambiguity and misinterpretation. There are e.g. two London Roads involved here, the B1172 London Road and the Old London Road. Please see the reasons section above and the changes section below for details.

**Change suggested by respondent:**

Please consider replacing the first sentence in the introduction with:

"This site is located to the south-west of the town with vehicular access proposed only from the to be constructed new roundabout at the junction of the B1172 London Road and the Old London Road."

Main Policy

Point 2: Please consider replacing this so that it echoes the wording above, as in:

"Vehicular access from the B1172 London Road and the Old London Road via the to be built roundabout, with a minimum 5.0 metre carriageway width, and 2.0 metre footway provision across the site frontage." Consideration to be given whether a footway should stretch the length of the site to the new roundabout junction.

Point 5: Please consider removing "Abbey Road or" from this sentence.

Please clarify the main access point onto the site.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23727

Support

**Wymondham, 4.56****Respondent:** Ms Cecilia Riccardi [14061]**Summary:**

GNLP0320 (Gonville South)

Support: planners view that site GNLP0320 is an unreasonable alternative.

Object: landowners view that their proposal for GNLP0320 Gonville South site (500 homes) should be upgraded to "reasonable allocation or contingency" because the development of 335 homes on their adjacent land at Gonville North negates the planners "too remote from main settlements" argument. This line perversely renders the next empty field to any development fit for development.

Request: that planners, for soundness, make clear that there are a whole range of considerations, beyond utilities and access, to be taken into account before a site is considered reasonable.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24510

Object

**Aylsham, Settlement Map****Respondent:** Cllr Steve Riley [20017]**Summary:**

Response to GNLP Regulation 19

Steve Riley Aylsham resident and District Councillor for the Aylsham ward .

Is the plan legally compliant?

To ensure legal compliance the following must be adhered to:

- The process of community involvement for the plan should be in general accordance with the LPA's Statement of Community Involvement [SCI]. No Aylsham virtual engagement have been used to "to engage with community and stakeholder bodies.

- 1.6 Paragraph 155 of the National Planning Policy Framework (2012), states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged.

The Town Council and residents were not approached and there is no evidence that "a wide section of the community has been proactively engaged".

- Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate] requires Broadland to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan.

The LPA will be expected to provide evidence of how they have complied with the duty.

In regards to Buxton parish council, Burg and Tuttington, Aylsham T C , Broadland has not engaged constructively, nor with North Norfolk District Council.

I ask that Broadland provide evidence of how they have complied with this duty.

From the above for Regulation 19 to be legally compliant there must be evidence of consultation. Below are the key points on this issue.



- Aylsham Town Council and residents of the town and the District Councillors were consulted on Regulation 18 which only included one site off 300 houses. The second site of 255 house was not consulted on and infrastructure considered or examined for the additional site. The additional site has been added to in reg 19 without the appropriate consultation. With consultation it may have been viewed that the second site was not viable re infrastructure or phasing would be appropriate and considered for the second site to allow infrastructure to be built re capacity to support and the need of an additional school built and then staffed by county in a timely manner.
- There has been no consultation with Aylsham Town Council or the residents on the changes regarding the content of the sites section of Regulation 19. There are two sites in Regulation 19 total 550 homes, an increase of 83% on the homes consulted upon in Regulation 18. Infrastructure could not be consulted upon and therefore examined to see if this could support a second site.
- There was no consultation on Regulation 19 with Aylsham Town Council or residents in regard to the infrastructure as it was assumed by the GNLP board that Regulation 18 consultation was sufficient, despite the significant changes in the two plans.
- The GNLP suggested that the feedback for Reg 18 gave 'confidence to the deliverability of new residential development in Aylsham'. The only supportive responses came from the developers. Therefore, the understanding of the response is inadequate and therefore both not legally compliant and unsound.

Is Regulation 19 Sound?

Is Regulation 19 positively prepared?

- There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham and why consultation is important, however the second site was not included in reg 18, so has not been consulted upon.
- Previous documents produced by Broadland District Council, the GNLP and Anglian Water highlight the problems of water supply and sewage disposal in respect of Aylsham. The requirement of an upgrade by Anglian Water is made but this does not come with guarantees or timescales. This issue was highlighted as a severe problem with the recent developments and with the one site put forward in Reg 18 this was considered a major issue. Burg and Tuttington are not consulted on second site and sewage issues are still a problem following recent new build in Aylsham.
- By putting forward two sites the quality and speed of broadband will be severely tested and there will be a strong chance that the Central Government Target will not be met.
- Reg 19 describes the uniqueness of the town highlighting its history and the importance of retaining this. This has been a severe problem with the recent developments of 550 new homes at Willow Park and Bure Meadows, to add a further 300 as in Reg 18 would strain this considerably. However, to increase the number of new homes by a further 83% on the edge of the town indicates that Reg 19 could not have been positively prepared as the evidence points to significant damage to the uniqueness of the medieval town. Parking is limited in the town centre for access to shops by the very nature of the old town layout and cannot support unless improved additional parking is planned for in some way. The second site was not consulted upon in reg 18 and therefore this could not be taken into account.
- Reg 19 states that it has considered the impact of Covid. However, there is a lack of analytical analysis to show how that will impact on Aylsham's way of life and economy post pandemic. In Reg 18, Aylsham was allocated one site. Then, in the middle of the Covid crisis, the town was allocated two sites without consultation, or consideration that more brownfield sites may become available when the crisis is over. This indicates that Reg 19 has not been positively prepared and opportunities to look beyond the large-scale developments on the edge of towns and cities have been lost.
- There is a similar lack of thought in Reg 19 concerning Brexit, which will have a significant impact on the greater Norwich area. To commit, without consultation, two sites for a small market town such as Aylsham, when the country will be in a significant period of economic flux demonstrates a lack of preparation and thought.

Is Regulation 19 Justified?

- As stated under legal compliance, the residents of the town were consulted on the need for ONE site. There were concerns with Reg 18, particularly in respect of the demands it would make on the infrastructure of the town. However, to have two sites as in Reg 19 magnifies these infrastructure issues. In Reg 18 there was no mention of Aylsham having two

sites and there has been no consultation with the Town Council or the residents on the allocation of two sites in Reg 19. Therefore, Reg 19 has not met the test of being justified and how it relates to reg 18.

- Two sites brings an increase to the proposed level of development to 83% on the consultation figure – 550 homes increases the total number of homes by 15.6%. The population of the town is likely to increase by a similar figure. This increase contradicts point 188 in the Strategy section which states there should be “reasonable levels of growth in the main towns.” This increase cannot be met by the current infrastructure in the town or by improvements offered by the plans within Reg 19. The second site was not consulted upon in reg 18 and is therefore not justified.
- Recently planning permission has been given to windfall sites on significant numbers over and above the existing local plan and since reg 18 was consulted upon, this has not been taken into account in regulation 19 with the additional site for Aylsham. Therefore Broadland have affectively over egged the additional numbers of extra housing required in this new proposed plan and therefore this is not justified.
- There is a lack of clarity and urgency in Reg 19 on the building of a primary school. A sound approach would be to state that, with all the primary schools in Aylsham full, the building of the school should take place as a priority along with the first site in regulation 18 and not after a second site, which has not been consulted upon or phasing of a second site to help resource this re infrastructure could be considered as the second site was not consulted upon in reg 18.
- On the original Reg 18 consultation there was a policy for a school in Aylsham, but this is watered down in Policy GNL0311, 0595 and 2060 where it merely states “2 ha of land at nil value to be provided for a new primary school on site”. There are no details as to when this will come forward. The school needs to come before the houses. There is no capacity in Aylsham schools currently and the full impact of the new housing at Bure Meadows and Willow Park is still to be felt. Also, we understand, this is not a new school, but a replacement of the existing school and there is no indication of the increase in size. There is a lack of urgency in this policy. Schools in neighbouring villages are also at capacity and Aylsham High School is also near capacity. In Reg 18 there was consultation on one site and the provision of a school. As there has been no consultation for two sites, the significant impact this will have on the provision of education in Aylsham and the surrounding area has not been addressed. Therefore, the decision to allocate two sites is not justified.
- There is limited nursery provision in Aylsham. This will be put under significant pressure by 300 homes let alone the extra 250 homes allocated.
- The road network through the town will not cope with the extra traffic generated by the new school and the increased population. The developers of this site and the GNL0311 have put in some mitigating factors in the immediate vicinity of the sites but ignored the fact that the road from the town to the site is already busy and in places needs to be single tracked and cannot be widened to accommodate additional traffic. These road problems will be magnified with the second site on Norwich Road and the possible additional site at Badersfield in North Norfolk. In addition, creation of nearly 900 new homes within a short distance of Aylsham town centre will create severe parking problems, which, pre-Covid, was already a major issue in Aylsham and will return when Covid is over. These issues highlight that the plans for Aylsham in Reg 19 are not sound as the document has failed to make a case that they are justified and will not significantly harm the town, no consultation on the second site in reg 18 took place, therefore considerations for infrastructure in this regard could not be taken place.
- The consultation in Reg 18 concerning the issue of health and social care was in regard to 300 homes. Aylsham Care Trust (ACT) responded to an earlier consultation that they would like to see a day unit built to try and keep people in their own home, which is in keeping with government policy. In addition, there are already urgent problems regarding medical care within the town, which Reg 19 fails to consider. Reg 19 fails to justify how two sites with 550 homes would not have an adverse impact on the health and social care of the town in putting forward the second site, Reg 19 offers a 90-bed care unit/extra care housing. However, without consultation, the response to the needs of health and social care and infrastructure in general within Aylsham have not been met and there is a real problem of soundness in examining all health care needs with doctors stretched in the surgery's.
- The points above highlight how the allocation of two sites contradicts the Strategy section point 132 which states that new communities “will be reasonable and sustainable communities” and “well integrated with our existing communities”. Reg 19 is not justified as no consultation has taken place under reg 18. For Broadland to consider moving forward to reg 19
- In point 136 it states that “homes will have good access to services and facilities” and they “will enhance local character to meet the needs of all mixed communities”. The failure to meet the infrastructure needs of the town, while wanting to expand the number of new homes by 83% from Reg 18, does mean that Reg 19 is not justified in respect of the document's own strategy, as this second site has never been consulted upon.

**Is Regulation 19 effective?**

- I can find no evidence in the document that there has been any consideration of what is happening in the area to the north, north east and north west of Aylsham, which is in North Norfolk Local Authority. Recent announcements regarding a possible development of 300+ houses at nearby Badgersfield will have an impact on Aylsham, as the majority of children from Badgersfield attend Aylsham High School. There would also be increased pressure on the town centre and other services. This development is almost akin to a third site in Aylsham. Therefore, Reg 19 fails to be sound on a basic issue, consulting with and working with the neighbouring authority (See Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate]).

**Is Regulation 19 Consistent with National Policy**

- Central Government Policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by the addition of a second site for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target. One site, of which was consulted upon in Reg 18, was a real concern regarding working towards a climate neutral target, however increasing the numbers with a second site to increase the number of new homes dependent on cars by 83% without consultation is not in keeping with Central Government Policy and the Paris Accord.

**Conclusion**

- Reg 18 consulted on only one site, the second site that has been added with in reg 19 has never been consulted on and issues re infrastructure and the impact on the Towns Historic Imperative, the social and care need, long standing parking issues re services in the town re shops and other infrastructure resources, could not be considered by Broadland. Therefore, this means that Reg 19 has failed to be legally compliant, sound.
- Reg 19 has failed in soundness in its failure to keep to the strategy put forward as part of the Plan and central government policy.
- An important strategy of the document and central government policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by putting forward two sites for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target.

**Change suggested by respondent:**

What changes should be made to GNLPA Regulation 19 in respect of Aylsham?

Recently planning permission has been given to windfall sites on significant numbers over and above the existing local plan and since reg 18 was consulted upon, this has not been taken into account in regulation 19 with the additional site for Aylsham. Therefore Broadland have affectively over egged the additional numbers of extra housing required as now outlined in reg 19 consultaion and therefor this is not justified and the second site should be removed

The addition of a second site should be removed as this was not consulted and any possible infrastructure issues identified or examined or considered as outlined in my submission or the Historical imperative of the Old Town in the context of reasonable growth for main towns or has taken into account the collative effects of recent new home build that have already taken place. There for is not legally sound or properly prepared.

If the second site is not removed at this stage, then to ensure that this is legally sound and properly prepared and justified, then this should be consulted on as per reg 18 stage again to make legally sound, compliant and properly prepared and justified which may mean the second site is removed or phasing takes place once infrastructure has been examined and considered or it is demonstrated that the infrastructure can support and pints with in my submission as outlined, then procced to reg 19 to ensure legally sound, compliant and properly prepared.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:****Appear exam:** Not specified**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/4gc>**23397****Object****Policy 0596R, 4.7****Respondent:** Mr Peter Riseborough [18981]**Summary:**

This proposal didn't form part of the 2018 consultation. Aylsham's infrastructure is inadequate to cope with this, including no NHS dentists available. The N&N hospital is stretched at the moment and this proposal, considering the demographics suggested, will further strain it.

Housing estates with management companies are divisive and favour well off home owners.

**Change suggested by respondent:**

If there is a future need for housing in Aylsham it needs to be phased and infrastructure such as Dr's, dentists, schools, and sewage treatment need to be provided in advance of demand being created.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None**23399****Object****Delivery, 144****Respondent:** Mr Peter Riseborough [18981]**Summary:**

Windfall developments are concealing the true nature of developments in villages in South Norfolk. Some villages, example given, have no facilities, necessitating car journeys to access these.

**Change suggested by respondent:**

There needs to be a clear plan communicated to those affected of the true extent of likely future building numbers.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23400

Object

**Appendices, Appendix 1 Infrastructure Requirements****Respondent:** Mr Peter Riseborough [18981]**Summary:**

I believe there is a shortfall in sewage treatment provision in Aylsham. The statement that "there may be future capacity issues to be addressed". Is not good enough. There needs to be a clear plan in place prior to any increase in housing in Aylsham.

**Change suggested by respondent:**

A clear statement from Anglian Water of how the sewage from the proposed developments is to be dealt with.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23401

Object

**Appendices, Appendix 1 Infrastructure Requirements****Respondent:** Mr Peter Riseborough [18981]**Summary:**

The comments surrounding Primary care, Hospital provision and mental health provision seems to be very much jam tomorrow. As anyone who lives locally will know, the Norfolk and Norwich Hospital struggles, the mental health care provision has lurched from disaster to disaster and the ambulance trust has been fined for poor performance. There is no mention of dentists even though there is a shortage of NHS provision. All this and the suggested demographic of future residents is an older and therefore increasingly needy population.<https://www.bbc.co.uk/news/uk-england-norfolk-48910712>. <https://www.edp24.co.uk/news/health/cqc-inspectors-find-bullying-and-sexual-abuse-at-east-of-3388724>.<https://www.greatyarmouthmercury.co.uk/news/norfolk-and-norwich-hospital-waiting-list-for-operations-nnuh-1517356>

**Change suggested by respondent:**

Investment before construction.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23489

Support

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

We support the allocation of land at Browick Interchange, Wymondham as a strategic employment location.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23486

Support

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

We support the identification of Wymondham as one of the main towns but do question the level of housing being directed to the Norwich Urban Area as a proportion of total housing supply.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23487

Object

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**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

Greater clarity is required for the definition of 'delivery plans' reflecting the varied nature of parties that promote planning applications.

**Change suggested by respondent:**

Additional explanation is required as to what the Council believes a 'delivery plan' to be and that definition needs to reflect that some applicants are not the actual provider of new dwellings and therefore cannot specify delivery dates or programmes.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23488

Object

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**Policy 5 Homes, Policy 5 Homes****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

Justification for 40 dwelling threshold seems absent and the relevant policy wording needs clarifying.

**Change suggested by respondent:**

Justification to be included and wording tidied up.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23490

Support

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

We support Wymondham accomodating the greatest proportion of the housing growth that is being directed to the Main Towns.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23491

Support

**Wymondham, 4.64****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

Our clients own Site GNLP0354 (land at Johnson's Farm) and we support the allocation of this land for residential development in the Submission Plan. The land in question is in single ownership, it is free of physical constraints and it is available immediately. It is highly suitable for residential development and it can be delivered within 5 years thus contributing to the local 5-year housing land supply position. Our clients, the freehold owners of this site, are committed to ensuring its delivery and have promoted this site, and wider landholdings, through previous local plan processes.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23492

Support

**Policy 0354R, 0354R Policy****Respondent:** RJ Baker & Sons [19063]**Agent:** Cheffins (Mr Ian Smith, Director) [17591]**Summary:**

We support the policy with one minor comment. This is a highly suitable site which is relatively constraint-free and capable of being delivered in the short term.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Conceptual Master Plan.pdf - <https://oc2connect.gnlp.org.uk/a/44f>

23718

Object

**Foulsham and Themelthorpe, 6.37****Respondent:** Mrs candida robertson [19203]**Summary:**

As a resident of Foundry Close, adjacent to Stringers Lane / Audrey Rix development, there is already an issue with the poor access, speeding vehicles, alongside residential parking and access to private parking. The infrastructure is not suitable for an increase of traffic.

**Change suggested by respondent:**

Opinions must be taken into account

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24107

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Mr Bryan Robinson [14521]**Summary:**

- 13.1. My concerns regarding the inadequacy of the GNLP are tempered by the potential consequences of a free-for-all land grab if the plan is rejected and the JCS is considered out of date.
- 13.2. The residents of Greater Norwich have been badly let down in getting to this position for a plan which commenced in 2017 but will be concerned that the consequences of rejection of the plan on submission for inspection may be worse than those of accepting a substandard version.
- 13.3. The only solution I can see is to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic; remove the NWL from the plan and tighten up the policies and targets for the environment and climate change before submission to the Inspector for approval.
- 13.4. It is acknowledged that this may delay the submission but this would be less disruptive than rejection or a lengthy process of amendments later.
- 13.5. I am concerned that the 2021 Budget statement has changed the dynamics of East Anglia to which the plan as it stands cannot respond.
- 13.6. The growth ambitions for Greater Norwich have been severely weakened by the Budget announcement of the selection of Felixstowe as a Freeport which will cover a radius of 25 miles and encompass several major employment areas which will have the advantage of several business incentives and will be competing commercially with Greater Norwich and its associated export/import outlets of Great Yarmouth and Norwich Airport.
- 13.7. Literature for Freeport East is keen to stress the advantages to other areas highlighting Lowestoft/Great Yarmouth via the A12 and The Midlands via the A14.
- 13.8. Sadly the omission of upgrading the sub-standard northern section of A140 between Norwich and Ipswich and concentrating employment to the A11 Norwich to Cambridge corridor is likely to mean that Norwich will not be part of this growth generated by Freeport East.

See full representation for further details

**Change suggested by respondent:**

-

**Legally** Not specified  
**compliant:**

**Sound:** No

**Comply with** Not specified  
**duty:**

**Appear exam:** Not specified

**Attachments:** Full representation - <https://oc2connect.gnlp.org.uk/a/4gk>

24538

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Mr Bryan Robinson [14521]**Summary:**

The plan is short of information as to the effect on transport anticipated from the correlation for housing and employment sites and the implications for climate change.

There are conflicting statements in the GNLP concerning the NWL and it is unclear in the plan of its purpose, whether it is essential to growth or merely a local improvement to reduce congestion in the area.

See attachment for full information and full representation

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full representation - <https://oc2connect.gnlp.org.uk/a/4gk>

24536

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** Mr Bryan Robinson [14521]**Summary:**

Climate Change and Carbon Reduction

9.1. Returning to the 22% - 30% buffer overprovision, it must be obvious that any excess house building above need will slow the path to zero carbon.

9.2. Climate change reduction locally, nationally and globally should be of primary overriding consideration but the implications of overprovision of land for this internationally agreed necessity is not addressed in the draft Reg. 19.

9.3. Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that:

"development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change".

9.4. The vision of the GNLP includes the statement at paragraph 131 that "our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national zero emission target by 2050."

9.5. Where is the evidence of this?

9.6. Whilst the GNLP Climate Change Statement states that it will "have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions,

recorded against the Climate Change Act and other key national statutory and policy frameworks", it does not include clear evidence-based carbon reduction

targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations.

9.7. There is no mention of the December 2020 target announced by the Government for a carbon emissions reduction of at least 68% by 2030 compared to 1990 levels.

- 9.8. Carbon emission details are available from 2005 but the plan should establish the 1990 levels for the GNLP area together to enable monitoring against this target.
- 9.9. Carbon emission reductions for the three Authorities from 2005 to 2018 were:  
 Broadland - 23% reduction (1.77% average annually)  
 Norwich - 42% reduction (3.23% average annually)  
 South Norfolk – 20% reduction (1.54% average annually)
- 9.10. It is essential for the GNLP to establish the carbon emissions between 1990 and 2005 setting the baseline emissions position for the plan to adequately monitor reductions to 2030 ensuring the minimum 68% reduction is achieved.
- 9.11. The data from 2005 would suggest that Broadland and South Norfolk will need to accelerate the speed of reduction to 2030 if they are to meet this Government target.
- 9.12. It is acknowledged that rural areas have higher levels of emissions than the national average which may require stricter measures and which should be addressed in the plan.
- 9.13. Both Broadland and South Norfolk have recorded slight increases in carbon emissions between 2005 and 2018 for transport.
- 9.14. Transport emissions are a critical area which needs to be addressed particularly noting that transport is 36% and 53% of the total emissions for Broadland and South Norfolk respectively against the national average of 36%.
- 9.15. There are no specific proposals in the GNLP outlining how this carbon emissions imbalance from transport will be resolved or evidenced that it will not be exaggerated by the location proposals for housing and employment in the plan coupled with any attendant additional transport infrastructure and increased commuting journeys.
- 9.16. Although the are numbers quoted in the GNLP for both jobs and housing there is no indication of correlation between them to determine whether transport emissions from work commuting will further increase over the period of the plan or more importantly by 2030.
- 9.17. It is probable that the site allocations will increase transport use rather than encourage a modal shift to other forms of transport as the ambition of the GNLP.
- 9.18. Reliance on the switch to electric vehicles for transport emission reductions will assist over the longer term but this will still be marginal up to 2030 unless the GNDP has information to the contrary outside the Reg. 19 draft.
- 9.19. The GNLP vision is endorsed but concern must be expressed that it is woefully lacking on specific measures and targets.

See full representation attached

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full representation - <https://oc2connect.gnlp.org.uk/a/4gk>

24537

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Mr Bryan Robinson [14521]**Summary:****Affordable Housing**

10.1. Policy 516 appears to restrict the use of Viability Assessments (VA)s in planning applications with the intention of reducing the percentage of Affordable Housing to Brownfield sites.

10.2. Whilst this is welcome to counter the misuse VAs which has almost become almost standard practice, Section 57 of NPPF states that it is up to the applicant to demonstrate whether particular circumstances justify the need for a VA and therefore the legality of this Policy needs to be considered.

10.3. Does this Policy restricting the use of VAs to brownfield sites create a conflict with the NPPF?

10.4. Policy 5 also differentiates sites allocated within Neighbourhood Plans proposing that a different percentage of affordable housing can be stated therein, overriding the minimum of 33% across the plan area.

10.5. The Affordable Housing Need is stated at paragraph 271 of Reg. 19 v 1.7 as 11,030 between 2015 and 2036 being 28% of the overall housing need as established in the 2017 SHMA Report.

10.6. The Housing Need has since been recalculated as 40,541 but the number of affordable housing has not been reassessed over the revised timescales.

10.7. Assuming the affordable housing percentages will apply to the 22% buffer of allocations above the defined overall housing need, basic mathematics determines that the number of affordable housing units will exceed the need by 2,427 if all the sites are developed over the period.

10.8. Affordable Housing provision on a site is a contributor to establishing profitability for the developer and therefore may inhibit development if there is an overprovision, continuing to the circularity of controlling the supply of all housing.

10.9. The Plan does not indicate the reduced number of affordable homes are already in the system through the reductions in Neighbourhood plans and committed sites with approved lower percentages of affordable housing.

10.10. All this data should be readily available to the GNPD and the plan should show the numbers of affordable houses which will be provided against this policy for meeting the overall housing need target and how this will be managed in scenarios where the overall need is not being met and if annual completions are nearer to the target including the 22% buffer.

10.11. Without this study comparing potential extra affordable homes if the buffer is built out and reductions from Neighbourhood plans and lower approved numbers in existing commitments the policy on affordable homes is meaningless.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full representation - <https://oc2connect.gnlp.org.uk/a/4gk>

23643

Support

**The Natural Environment, 108****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

Many of the protected sites have already been adversely affected as a result of nutrient loading from a variety of sources both diffuse and point. The challenge is to remove the adverse impact, not add to it.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23646

Object

**Water, 121****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

The statement is inaccurate and biased suggesting agricultural activities are the cause of drought stress.

**Change suggested by respondent:**

The scale of abstraction to provide water for households and businesses is a key part of the puzzle and needs to be recognised in this part of the plan. It is the in-combination impact of a misuse of and a lack of respect for the water resource combined with natural climatic conditions that explains why the region is under severe drought stress.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23648

Support

**The Natural Environment, 212****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

Important to stress that design features such as specific bricks providing a nest site for swifts are easy to incorporate and deliver and a simple example of net gain.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23644

Support

**The Natural Environment, 109****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

Water quality is one of two factors influencing natural functioning of protected wetland sites. The other factor is water availability. Both of these factors if adverse can impact protected wetland sites both alone and in combination. Many protected sites and water bodies are in unfavourable condition as a result of decades of pollution combined with adjacent abstraction. These activities have already taken the ecology of these sites and their species far away from a natural state.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23645

Object

**Soils, 119****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

Soils within the landscape are important for practices other than agriculture. The suggestion from this section of the plan is that agriculture is the only activity where soil condition is relevant. This isn't the case.

**Change suggested by respondent:**

The plan needs to cover other land use categories, where soil is an important resource. For example peat soils are valuable in providing habitat for protected species and habitats, they also capture carbon and offset the impact of climate change. These peat soils also provide a growing medium for plants such as reed and sedge which are harvested. Often mismanagement of 'tilled soils' leads to an adverse impact on other soils types through sediment and nutrient loading. The range of soils types and their juxtaposition makes the overall landscape and the character types unique and special and makes the GNA what it is.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23647

Object

**Environment, 149****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

The paragraph states the quality of our environmental assets will be enhanced, but doesn't describe how or by whom. This quality will be maintained and enhanced by the landowners not the GNLP.

**Change suggested by respondent:**

The plan delivers a bold statement describing enhanced quality of environmental assets but fails to qualify who will do this and how it will be funded. Most enhancement will be carried out by landowners, including conservation organisations using funding from charitable donations and various grants. Improved access to the countryside is desirable so long as it is and can be managed, and the effective use of developer contributions will be a key mechanism. RSPB very much doubts pressure on protected sites will be reduced by creating green infrastructure and the NW Woodland Country Park. c44,000 new homes with an average occupancy of c2 means on average 88,000 new residents. These residents will want to explore the GNA beyond the boundaries of green infrastructure on and linked to developments. This exploration needs to be mitigated for within the GIRAM process and appropriate allocation of develop contributions.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



23649

Support

## The Natural Environment, 220

**Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]

### Summary:

How this fund is managed and the monies allocated will be critical to providing both sustainable access and an enjoyable experience connecting people with nature. Many existing 'honey-pot' sites have infrastructure susceptible to more rapid deterioration e.g. trails constructed from natural materials. Upkeep and maintenance of safety standards are costly and will require support from this fund to enable the GNA to retain and sustain its attractiveness and appeal.

### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23650

Object

## Map 8A Green Infrastructure Corridors in Greater Norwich, Map

**Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]

### Summary:

The green infrastructure corridors suggest access will be promoted along routes which pass or lead to legally protected sites. Many of these sites harbour scarce species and congregations of species e.g. birds which are highly susceptible to alone or in-combination disturbance. Equally the corridors extend into neighbouring plan areas and it isn't clear whether this transitioning between these adjoining plan areas has been considered.

### Change suggested by respondent:

The maps are simplistic showing broad green lines with the assumption these proposals will be beneficial. Rather than providing a single colour showing access routes provide a more considered representation with a RAG rating approach which overlays the proposal describing limiting factors such as disturbance of wildlife or deterioration of infrastructure which will result from an increase in recreational activities.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23651

Support

**Water, 257****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

The GNA has already been recognised as being in a state of severe drought stress. Coupled with the impacts of climate change this will be one of the key limiting factors to the sustainable management of all interests within the plan area. Development, misuse and a lack of respect for the water resource has already caused damage to protected sites and lead to loss of protected species. Before considering the potential for further impact on these sites and species RSPB suggests redressing the balance towards more natural, historical conditions.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23652

Object

**Water, 258****Respondent:** RSPB (Mr Ian Robinson, Conservation Officer) [19910]**Summary:**

It is disappointing that such a core issue as water is reduced to a single line statement with a link to such a critical study. What this entry fails to state is that the WCS is only at the draft stage and open for consultation, having only been recently released. The information does not elaborate on some serious issues outlined within the WCS regarding headroom capacity of WRC, especially Whitlingham Trowse and therefore doesn't make it clear that until upgrades to these facilities are made development will not be permissible.

**Change suggested by respondent:**

The information provided needs to be an honest appraisal of the situation and capture both the infrastructure and behavioural changes which will be needed to realise a sustainable approach. The reader is left with the impression that there are no barriers to development and the WCS is just another linked document with little to add. This is far from the truth. It also fails to show partnership with service/resource providers and a joint approach and suggests Anglian Water Services need to fix a problem not of their making. Only through partnership and collaboration will a sustainable, cooperative, future-proof end point be reached.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** GNLP Reg 19.docx - <https://oc2connect.gnlp.org.uk/a/45j>

23456

Support

**Taverham, Settlement Map****Respondent:** Mr Peter Roe [17112]**Summary:**

I wish to support the GNLP which excluded GNLP4040 for the following reasons:

1. This site is not suitable as it has insufficient frontage to form acceptable access to Taverham Road.
2. Mack's Lane is not suitable to support development traffic and access to the site.
3. It is intrusive to the landscape character being located in proximity to River Wensum, SAC, SSSI

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23284

Object

**Introduction, 300****Respondent:** Mr Arthur Rope [19796]**Summary:**

The Town Council was not consulted on the 83% increase since Regulation 18 and our representatives on Broadland were not party to this decision taken by Cabinet. A 15% increase in housing is excessive for Aylsham with its infrastructure problems (schools, doctors' surgeries, traffic management, car parking), limited public transport, waste disposal limitations and so soon after the completion of two recent large developments.

**Change suggested by respondent:**

Remove GNLP 0596 or at the very least defer its start to 2032 (when it could be reviewed) to allow for infrastructure issues to be addressed and the need for so many more houses to be tested by experience in the intervening years. The GNLP appears to be aiming for 49,492 new dwellings when the Government formula only requires 40,500. Therefore there is capacity for the removal of some excess provision.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23285

Object

**Aylsham, 352****Respondent:** Mr Arthur Rope [19796]**Summary:**

The Town Council was not consulted on the 83% increase since Regulation 18 and our representatives on Broadland were not party to this decision taken by Cabinet. A 15% increase in housing is excessive for Aylsham with its infrastructure problems (schools, doctors' surgeries, traffic management, car parking), limited public transport, waste disposal limitations and so soon after the completion of two recent large developments.

**Change suggested by respondent:**

Remove GNLP 0596 or at the very least defer its start to 2032 to allow for infrastructure issues to be addressed and the need for so many more houses to be tested by experience in the intervening years. The GNLP appears to be aiming for 49,492 new dwellings when the Government formula only requires 40,500. Therefore there is capacity for the removal of some excess provision.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23584

Object

**Horsham St Faith, 6.71****Respondent:** Cllr Dan Roper [15738]**Summary:**

1. GNLP0125R has not been subject to Reg18 consultation in its current proposal. Consultation only completed on a smaller proposal with significant local opposition.
2. Housing figures for St Faiths do not account for over delivery of HNF1 in application 20182043 nor ongoing application 20191920 that would deliver 16 properties through infill. Likewise 20130853 has been delivered during current local plan period.
3. Sufficient housing growth can be achieved through infill. Building outside current settlement limit is not necessary.
- 4 GNLP0125R would have significant constraints re safe access and is unsuitable.

**Change suggested by respondent:**

Removal of GNLP0125R from the plan and revision of housing numbers for Horsham St Faith.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24136

Object

**Aylsham, Settlement Map****Respondent:** Lynne Rush [19976]**Summary:**

Having had link's to Aylsham since 2002 and living here since 2014 I have seen the draining affects that the new housing estates have had on Aylsham.

I totally support the Aylsham Town Councils questioning of the legalities of the new Planning Proposal. Any new plans should include provision for Education, Health and Utilities. The schools and Doctor's are already struggling.

Traffic has increased profoundly causing impact on air quality through the town's small roads, the town's roads were not built for such constant heavy traffic...even the new housing estates roads are too narrow, no allowance for cars parking on the road causing an increase in traffic build ups, increased traffic fumes especially at school times. The damaging affects can be seen on a daily basis.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24055

Support

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Salhouse Parish Council (Clerk at Salhouse) [19774]

**Summary:**

Salhouse Parish Council has no objections to this regulation 19 publication, however has some comments below:

**Summary:**

It would appear that this regulation will not really affect Salhouse Parish. As Salhouse comes under what is known as village clusters, growth will not substantially affect Salhouse. As the Salhouse Neighbourhood Plan is already in place it really just reinforces what has already been adopted.

**Supporting Evidence:**

Under Policy 1 - The Sustainable Growth Strategy, the housing growth over the 20 years is split across 4 key areas, with the fourth, "Village Clusters" where Salhouse sits, itself split into two parts (being "Broadland" and "South Norfolk").

In the "Village Clusters" group they are looking for 4220 homes in the 20 years from 2018; the "Broadland" split accounting for approx. 38% of those (1628no.). Of that, 1146 are already identified as a "deliverable commitment" - which is taken to mean they have approved sites to develop. So that leaves just 482 homes across 20 years spread across all of the Broadland "village clusters" – although the analysis does not give a clear indication of the number of these clusters.

As stated, Salhouse already has the Neighbourhood Plan adopted and in use as a planning tool, so the Parish Council has the means at its disposal to do what it can to control the size of development to ensure its appropriateness for the village - Salhouse should/may take its "fair share" of those 482 future homes, but that fair share should be proportional to the village's current size, so one's and two's, possibly 5; certainly not 10's to a hundred of new homes within the village.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

**R31, R31 Policy**

**Respondent:** Savills (UK) Ltd (Mr Mark Hodgson, Associate Director) [13086]

**Petition:** 2 petitioners

**Summary:**

On behalf of our client, AWG Land Holdings Ltd, we wish to support the allocation made under reference R31.

Norwich is the most sustainable location within the Greater Norwich Local Plan area as the highest order settlement. This site constitutes previously developed land within the urban area of Norwich and therefore represents a suitably sustainable location within the plan area.

The site benefits from an existing access and can be developed. The principle of the development has previously been accepted in the existing adopted Local Plan.

Anglian Water wishes to ensure it has sufficient land for its future needs although there is no requirement in the current plan period for infrastructure investment. This means that the number of homes that can be accommodated on the site is approximately 60 homes based on an area of approximately 1.4ha as confirmed in the policy.

Since the site allocation boundary extends to the river and is over 1 hectare, with approximately half of the site lying within Flood Zone 2, the subsequent planning application will be accompanied by a Flood Risk Assessment as the policy notes.

The site will need to be decommissioned to ensure there is no contamination and this would take the form of routine site investigation as envisaged by the policy.

The land as proposed to be allocated will be available for redevelopment within the plan period to 2038.

The allocation of this site is also likely to secure the future of the locally listed buildings on the site as part of any redevelopment scheme that comes forward.

In conclusion we support the allocation R31 at Heigham Water Treatment Works, Waterworks Road, Norwich

See attached

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** R31 Representation - <https://oc2connect.gnlp.org.uk/a/49x>

23759

Object

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**Policy 0605, 6.38****Respondent:** Miss Katie Scarfe [19118]**Summary:**

The plan poses a road safety risk to children and any other pedestrians who will be using the route.

**Change suggested by respondent:**

Find another development site more appropriate in the village.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23755

Object

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**Policy 0605, 0605 Map****Respondent:** Miss Katie Scarfe [19118]**Summary:**

The current proposed planning site suitability is flawed. To provide access to the proposed housing there would need to be a removal of the hedgerow which is protected by law, and promotes biodiversity in the area. There is no safe pedestrian route to school, and the site has been used in the past for arable use which was not mention in the initial call for sites proposal. There is also no mention of the conservation area which the site will back onto and any mitigation works in connection with this conservation area and or the wildlife. The plans are flawed.

**Change suggested by respondent:**

The plan should be stopped and another suitable site found e.g. a brownfield site.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None



23757

Object

**Policy 0605, 0605 Policy****Respondent:** Miss Katie Scarfe [19118]**Summary:**

The access to the proposed GNLP0605 development is dependant on gaining access through Aubrey Rix Close. At present there is no access, a fence and a potential historic hedgerow runs across the necessary access. The current owner of GNLP0605 does not own this access. Even if access was available the site still would not be suitable and highways need to survey and the current infrastructure to include the high street and the junction connecting the proposed development access with Foundry Close

**Change suggested by respondent:**

The plan should be stopped.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23762

Object

**Foulsham and Themelthorpe, 6.35****Respondent:** Miss Katie Scarfe [19118]**Summary:**

-School is not easily expanded for the reasons highlighted above.  
 -High street is congested and cramped. Cars have to park either side of the street. With more houses and greater use of the high street this would present more traffic throughput and greater risks to pedestrians.  
 -Employment opportunities are limited with the local businesses (pub, shop and other small businesses) limited to family run enterprises  
 - Transport connections are poor with the bus service to Norwich available by walking up to the main road via a dangerous unlit 60mph road

**Change suggested by respondent:**

Plans need to be stopped - find another site.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23763

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Miss Katie Scarfe [19118]**Summary:**

The plan for Foulsham has not been refreshed to take into consideration the recent approval of a large brownfield site planning application for 12/15 new build within the village boundry, Blyth's old builders yard, Claypit Road. This in conjunction with the "13 additional dwellings with planning permission on small sites" highlighted in the potential to achieves the 28 households highlighted. It seems inappropriate to be planning more than required housing quota by 2038 within a village that only provides one shop and one pub to its residents.

**Change suggested by respondent:**

Refresh greater norwich plan to update more recent site approvals.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23765

Object

**Foulsham and Themelthorpe, 6.37****Respondent:** Miss Katie Scarfe [19118]**Summary:**

There is a danger to safety of pedestrian's caused by poor access where the Aubrey Rix Close development from Stringers Lane, meets Foundry Close. Further use increases this risk on a junction that is already narrow with cars parked either side. Construction traffic required to access the site via a poorly designed junction. Destruction of the wildlife corridor has not been considered.

Potentially historically significant hedgerow that has not been considered in the plan which would required to be removed for access to be gained to the site. Call for Sites has false statements and highlights no benefits!

**Change suggested by respondent:**

Find another site.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23766

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Miss Katie Scarfe [19118]**Summary:**

There are numerous road safety concerns associated with the proposed GNLP0605 - as well as this, the lack of access to the site through a potentially historically significant hedge and fact that the housing needs for the village have already been met by other sites means the GNLP0605 site allocation is no longer required

**Change suggested by respondent:**

Remove site 0605 from the plan of potential sites for Foulsham as other sites have filled the required quota. Over filling above the 28 required homes by 2038 risks over burdening the poor village infrastructure. Allocate the site to a safe location with more amenities such as doctors, larger shop ect and where village residents can use a bus service to get tot he local towns/cities. THIS IS NOT POSSIBLE IN FOULSHAM

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23480

Object

**Policy 0596R, 4.7****Respondent:** Mrs Christine Schaitel [19888]**Summary:**

This has been proposed without public consultation so it does not appear to be either legally or sound.

**Change suggested by respondent:**

A period of public consultation especially given that schools, Doctor's and facilities are under pressure following the construction of two new estates at Bure Meadows and The Willows and the new site to be developed on Burgh Road imminently.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23454

Object

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**Addressing Climate Change, Climate Change Statement****Respondent:** Hanne Lene Schierff [19871]**Summary:**

In response to the consultation of the Greater Norwich Local Plan would like to state my opposition to the current plans for the building of the Norwich Western Link Road. The inclusion of this proposed road is incompatible with the climate change statement and its inclusion is therefore unsound.

**Change suggested by respondent:**

In response to the consultation of the Greater Norwich Local Plan would like to state my opposition to the current plans for the building of the Norwich Western Link Road. The inclusion of this proposed road is incompatible with the climate change statement and its inclusion is therefore unsound.

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Written Representation**Attachments:** None

24147

Object

**Aylsham, Settlement Map****Respondent:** Fiona Scott [19978]**Summary:**

I am writing to object to the to Regulation 19 of the GNLP for Broadland.

This latest plan does not appear to be legal, sound or justified.

- **Illegality** - There has been no consultation on Reg. 19, no attempts to engage with community and stakeholder bodies. Regulation 18 was consulted on regrading the proposed building of 300 new homes, but Regulation 19, which has increased the proposed new homes to 550, has not, and it seems apparent that the only people who responded positively to the original Re. 18 plans were the developers.
- **Unsoundness and Lack of Justification**
  - o No attempt has been made to consult on the impact on the town's infrastructure or carbon footprint, nor to the damage to the existing medieval and elizabethan buildings, which are already being adversely affected by the volume of traffic.
  - o No attempt appears to have been made to liaise with adjoining North Norfolk Council, with regard to school provision, and to meet health and social care needs.
  - o The proposed 'new' school does not appear to have to be built before the new houses.

Aylsham Town Council have submitted a full and comprehensive document laying out tthe objections to Regulation 19, and rather than repeat all the arguments that they have specified so clearly, I would like to add my name to the objections, and endorse and support everything the Town Council have written.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23517

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Summary:**

To be sound the Local Plan should be consistent with national policy, which means that policies should be clearly written and unambiguous (see paragraph 16(d), Framework). The amendments put forward at question 6 ensures draft policy 1 is clearly written and unambiguous.

**Change suggested by respondent:**

Draft policy 1 refers to settlement boundaries in the Norwich Urban Area (which includes Thorpe St Andrew) and states that housing growth will be considered acceptable within settlement boundaries. An amendment to the policy map is proposed to include Oasis Sport and Leisure Centre GNLPO540 within the settlement boundary. This is on the basis that planning permission for housing development (ref: 20151132 and 20190016) has been approved and the inclusion of this land outside of the settlement boundary will weaken the interpretation of draft policy 1 as it will not be clear what is built form of a settlement and where the countryside policies should apply.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

23518

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Summary:**

In accordance with the Framework (16), Policy 7.1 could be more clearly written and unambiguous on development that affects the CWS in the regeneration area.

**Change suggested by respondent:**

We support the changes to policy 7.1 following previous representations we have submitted, notably on an increase in housing numbers, which have doubled from 2,000 to 4,000 homes to 2038. Also, given the complex nature of the East Norwich Strategic Regeneration Area (SRA), it is right that there is flexibility on the level of affordable housing requirements in general policy, allowing for the masterplan to address deliverability of the SRA. Additionally, the change in boundary of the allocation is also very much supported to include all land within the extant planning permissions 12/00875/O and 2011/0152/O; the May Gurney Headquarters site and within policy GNLP0360 (Deal Ground, Trowse Pumping Station and May Gurney). The regeneration area includes a CWS, which does not preclude development, and so a clear and unambiguous policy is required to assess the acceptability of proposals that will affect it. We therefore propose that Policy 7.1 is amended to set out a clear benefit a development can provide, such as 10% biodiversity net gain. Please see our representation to Policy 3, which should be referred to in Policy 7.1.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23519

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Summary:**

To be sound the Local Plan should be consistent with national policy, which means that policies should be clearly written and unambiguous (see paragraph 16(d), Framework). The amendments put forward at question 6 ensures draft policy 5 is clearly written and unambiguous.

**Change suggested by respondent:**

The draft plan states that an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as, inter alia, care homes (275, GNLP). Consequently, the draft plan makes a specific allocation for specialised housing for older people and site allocations with an element of specialist housing. This means that the plan should support the redevelopment of vacant or unviable care homes to other uses. We therefore propose amendments to draft policy 5, so that where existing older people's accommodation and others with support needs is either unviable, vacant or it does not have good access to local services then redevelopment to residential will be supported. Amended draft policy 5 below:

"Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use. Should it be demonstrated that existing older people's accommodation and others with support needs is either unviable, vacant or it does not have good access to local services then redevelopment to residential will be supported in principle. Irrespective of C2 or C3 use class classification, specialist older people's housing will provide 33% affordable housing or 28% in the city."

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None



23678

Object

**Utilities, 0360/3053/R10 Policy****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Petition:** 2 petitioners**Summary:**

In accordance with the Framework (16), Policy 7.1 could be more clearly written and unambiguous on development that affects the CWS in the regeneration area.

**Change suggested by respondent:**

We support the changes to policy 7.1 following previous representations we have submitted, notably on an increase in housing numbers, which have doubled from 2,000 to 4,000 homes to 2038. Also, given the complex nature of the East Norwich Strategic Regeneration Area (SRA), it is right that there is flexibility on the level of affordable housing requirements in general policy, allowing for the masterplan to address deliverability of the SRA. Additionally, the change in boundary of the allocation is also very much supported to include all land within the extant planning permissions 12/00875/O and 2011/0152/O; the May Gurney Headquarters site and within policy GNLP0360 (Deal Ground, Trowse Pumping Station and May Gurney). The regeneration area includes a CWS, which does not preclude development, and so a clear and unambiguous policy is required to assess the acceptability of proposals that will affect it. We therefore propose that Policy 7.1 is amended to set out a clear benefit a development can provide, such as 10% biodiversity net gain. Please see our representation to Policy 3, which should be referred to in Policy 7.1.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23680

Object

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**Thorpe St Andrew, Settlement Map****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Petition:** 2 petitioners**Summary:**

To be sound the Local Plan should be consistent with national policy, which means that policies should be clearly written and unambiguous (see paragraph 16(d), Framework). The amendments put forward at question 6 ensures draft policy 1 is clearly written and unambiguous.

**Change suggested by respondent:**

Draft policy 1 refers to settlement boundaries in the Norwich Urban Area (which includes Thorpe St Andrew) and states that housing growth will be considered acceptable within settlement boundaries. An amendment to the policy map is proposed to include Oasis Sport and Leisure Centre GNLP0540 within the settlement boundary. This is on the basis that planning permission for housing development (ref: 20151132 and 20190016) has been approved and the inclusion of this land outside of the settlement boundary will weaken the interpretation of draft policy 1 as it will not be clear what is built form of a settlement and where the countryside policies should apply.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23682

Object

**Drayton, Settlement Map****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Petition:** 2 petitioners**Summary:**

To be sound the Local Plan should be consistent with national policy, which means that policies should be clearly written and unambiguous (see paragraph 16(d), Framework). The amendments put forward at question 6 ensures draft policy 3 is clearly written and unambiguous.

**Change suggested by respondent:**

Draft policy 3 of the GNLP does not refer specifically to County Wildlife Sites ('CWS') but states that development proposals will be required to conserve and enhance the natural environment avoiding harm to designated and non-designated assets of the natural environment unless there are overriding benefits from the development and the harm has been minimised. This means that a CWS designation does not preclude development, but it will be a high and undefined bar to demonstrate that the benefits of development overrides harm unless policy is clearer. We therefore propose that draft policy 3 is amended to set out a clear benefit a development can provide, such as a 10% biodiversity net gain. Draft Policy 3 is proposed to read as follows:

"Development proposals will be required to conserve and enhance the natural environment (including valued landscapes, biodiversity including priority habitats, networks and species, ancient trees and woodlands, geodiversity, high quality agricultural land and soils) through: • being designed to respect and retain, and add to, natural assets; taking account of local design and other guidance, and undertaking landscape, biodiversity or other appropriate assessments if significant impacts might arise; • avoiding harm to designated and non-designated assets of the natural environment unless there are overriding benefits from the development, for example at least a 10% biodiversity net gain, and the harm has been minimised".

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23683

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** SERRUYS PROPERTY COMPANY LIMITED [19895]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Petition:** 2 petitioners**Summary:**

To be sound the Local Plan should be consistent with national policy, which means that policies should be clearly written and unambiguous (see paragraph 16(d), Framework). The amendments put forward at question 6 ensures draft policy 3 is clearly written and unambiguous.

**Change suggested by respondent:**

Draft policy 3 of the GNLP does not refer specifically to County Wildlife Sites ('CWS') but states that development proposals will be required to conserve and enhance the natural environment avoiding harm to designated and non-designated assets of the natural environment unless there are overriding benefits from the development and the harm has been minimised. This means that a CWS designation does not preclude development, but it will be a high and undefined bar to demonstrate that the benefits of development overrides harm unless policy is clearer. We therefore propose that draft policy 3 is amended to set out a clear benefit a development can provide, such as a 10% biodiversity net gain. Draft Policy 3 is proposed to read as follows:

"Development proposals will be required to conserve and enhance the natural environment (including valued landscapes, biodiversity including priority habitats, networks and species, ancient trees and woodlands, geodiversity, high quality agricultural land and soils) through: • being designed to respect and retain, and add to, natural assets; taking account of local design and other guidance, and undertaking landscape, biodiversity or other appropriate assessments if significant impacts might arise; • avoiding harm to designated and non-designated assets of the natural environment unless there are overriding benefits from the development, for example at least a 10% biodiversity net gain, and the harm has been minimised".

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

23313

Object

**Aylsham, 4.1****Respondent:** Mrs Valerie Shaw [19824]**Summary:**

I am in complete agreement with Trevor Bennett's comments:

"Reg. 18 put forward one site for Aylsham with 300 homes. There has been no consultation in respect of Reg. 19 where there are two sites 550 homes, an increase of 83% on the homes consulted upon in Reg. 18. This is not legally compliant with LPA's Statement of Community Involvement [SCI], 1.6 Paragraph 155 of the National Planning Policy Framework (2012) and Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate ]"

**Change suggested by respondent:**

I am in complete agreement with Trevor Bennett's comment:

"The second site put forward in Reg 19 for Aylsham should be withdrawn as the decision is not legally compliant due to a failure of consultation."

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23314

Object

**Aylsham, 4.4****Respondent:** Mrs Valerie Shaw [19824]**Summary:**

The plan is not positively prepared or justified in respect of allocating two sites and 550 homes without consideration of the infrastructure needs of the town, which are under strain from two recent developments of 550 new homes. To have one site under Reg.18 would have created problems, to have two sites magnifies the issue of infrastructure. There are problems of water supply and sewage disposal, the road network through the town will not cope with the extra traffic generated, the health and social care system and the education system will not cope with a population increase of 20%.

**Change suggested by respondent:**

The second site for Aylsham under Reg. 19 should be withdrawn.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23315

Object

**Aylsham, 4.5****Respondent:** Mrs Valerie Shaw [19824]**Summary:**

I am in agreement with Trevor Bennett's comments:

"The decision to allocate 550 more homes when there are still homes to be completed is unsound due to the impact on the infrastructure of the town. There is no indication as to when the Primary School would be built, when all the schools in Aylsham and the surrounding area are at capacity now. The decision to put forward a care home demonstrates a lack of consultation, not just with the Town, but also Aylsham Care Trust. This allocation is also in conflict with points 132 and 136 of the GNLP's strategy."

**Change suggested by respondent:**

I am in complete agreement with Trevor Bennett's comments:

"The second site for Aylsham should be withdrawn from Reg.19. Consultation should also be introduced with Town Council for the first site, in respect of the infrastructure needs of the town."

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23337

Object

**Policy 0503, 0503 Policy****Respondent:** Hall Farm (Hingham) Ltd (Des Shingfield, Director) [19837]**Summary:**

A member of the family who is no longer involved with the land put this forward. He has since left and the remaining owners (Michael, Pat & Sarah Shingfield along with myself) do not support this site being developed.

We wish to withdraw the site.

**Change suggested by respondent:**

We wish to remove this site from the plan. We have consulted all owners and they are all in agreement with this decision.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

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**23403****Object**

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**Policy 2019, 6.31****Respondent:** Mr John Shirley [18795]**Summary:**

Allied to COL1, there are surface water drainage, traffic and many other issues.

**Change suggested by respondent:**

HELAA assessment to be revised

Surface water and traffic strategy to be considered to meet NPPF

Environment and location to be considered

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** GNLP19,20,2021 - <https://oc2connect.gnlp.org.uk/a/448>

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**23404****Object**

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**Policy 2019, 2019 Map****Respondent:** Mr John Shirley [18795]**Summary:**

Traffic issues and road safety

**Change suggested by respondent:**

An accurate HELAA assessment

**Legally compliant:** No**Sound:** No**Comply with duty:** No**Appear exam:** Written Representation**Attachments:** GNLP19,20,2021 - <https://oc2connect.gnlp.org.uk/a/449>

23402

Object

**Policy COL1, 6.32****Respondent:** Mr John Shirley [18795]**Summary:**

Site will drain surface water onto Rectory Road - outside NPPF  
 Traffic issues and capacity of surrounding roads have not been given adequate consideration,  
 Site accesses cross "safe route to school" footpath in three places.  
 Negative effect on views, surroundings and Bure Valley Railway amenity.

**Change suggested by respondent:**

HELAA survey should be revised to reflect actual situation and traffic data.  
 Proposal should be completely revised or scrapped due to surface water drainage issues.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** GNLP19,202021 - <https://oc2connect.gnlp.org.uk/a/447>

23533

Object

**Site Assessment Booklets and Studies, Village Clusters – Broadland Assessment Booklets****Respondent:** Mr John Shirley [18795]**Summary:**

HELAA assessment is factually inaccurate  
 School cannot be extended without addressing serious traffic issues on Rectory Road

**Change suggested by respondent:**

Revise HELAA assessment relating to transport, services - see full supporting statement  
 Consider road safety issues accessing B1150 at two restricted visibility junctions

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** GNLP19,20,2021 redacted - <https://oc2connect.gnlp.org.uk/a/458>



23482

Object

**Coltishall, Horstead etc., 6.26****Respondent:** Mr John Shirley [18795]**Summary:**

The point that the school can be expanded has not been thought through. Being located on Rectory Road it is the school that causes most of the traffic issues on these narrow roads at peak times.

When the school was built in the 1990's the amount of vehicle journeys and their growth and the increased size of vehicles was not foreseen.

The school cannot be expanded without first addressing the road problem.

There are limited services in the village. Even the post office is now a car journey away in Hoveton or Badersfield.

**Change suggested by respondent:**

Look again at the allocations in Coltishall, conduct an accurate HELAA exercise (see my other comments on sites GNLP2019 and COL1 regarding the woeful shortcomings in this respect. Look at real traffic data through the villages since the opening of the NDR, project the impact of proposed developments in Badersfield, Hoveton and North Walsham and simply think how the B1150 and A1151 road bridges will cope with the additional traffic.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23483

Object

**Coltishall, Horstead etc., 6.27****Respondent:** Mr John Shirley [18795]**Summary:**

Allocation GNLP2019 will have a negative impact on the locality. Traffic data in support of this site is inaccurate. Services in village data is incorrect, the impact on the landscape has been underestimated.

**Change suggested by respondent:**

Obtain correct and up to date data, refresh HELAA and reconsider the allocation with proposals within 10km on the NE side of the River Bure.

Factor in the amount of windfall development already built since 2018.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23484

Object

**Coltishall, Horstead etc., 6.28****Respondent:** Mr John Shirley [18795]**Summary:**

Surface water drainage run off onto neighbouring properties

Traffic issues on Westbourne and Rectory Roads - difficult to negotiate at peak times, site on a narrow one way road and exits onto a blind main road crossroads which Highways have previously noted as needing improvement due to the accident history.

Services are a car journey from the site to most of our limited village facilities.

Inaccurate HELAA exercise data

Dominant in the landscape - site is at the highest point and immediately next to and above Bure Valley Railway and path tourism amenity, very visible from St James historic area.

**Change suggested by respondent:**

Obtain correct data and then reassess, factor in development proposed in settlements which use the B1150 road. Look at the negative impact to the landscape.

Think how Rectory Road will cope with an enlarged school generating more traffic.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23485

Object

**Coltishall, Horstead etc., 6.30****Respondent:** Mr John Shirley [18795]**Summary:**

I support the statement, however allocations COL1 and GNLP2019 are clearly outside this in all respects. There are no mitigations for flood risk, Broadland Planning application 20201627 states that this development will increase the risk of flooding to surrounding property (Q11 application form). SUDS shows worrying projections. Highways improvements non-existent apart from increasing traffic volumes and access roads bisecting the safe route to school footpath. Existing traffic issues not remedied, no provision for safely dealing with roadworks on the long narrow one way section of Rectory Road. Measures to protect the environment are unclear and landscape intrusion is completely ignored.

**Change suggested by respondent:**

Rethink with correct data and realistic projections. Planning application 20201627 demonstrates the shortcomings with these allocations; how visually intrusive, environmentally unsound and lacking in traffic/accident data these are. The lack of school capacity and the ill thought-out solution, the doctor's surgery oversubscribed and absence of up to date public transport information is noteworthy. also consider the effect of the thousands of other proposed houses on this side of the River Bure and their negative effect on the roads in Coltishall.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23534

Object

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**Site Assessment Booklets and Studies, Appendix A – Tables of Allocated Sites with reasons for allocation****Respondent:** Mr John Shirley [18795]**Summary:**

As an example, reasons for allocation GNLP2019 reads:

"After careful consideration this is the only site promoted which is suitable for allocation in Coltishall due to its location adjacent to carried forward allocation COL1. Vehicular access will need to be taken through COL1 and a Transport Assessment will be needed to demonstrate how highway issues at Rectory Road can be mitigated."

Despite the above "highways issues", the HELAA assessment for transport is "Green" this cannot be correct. This development and COL1 will dominate the landscape, roads bisect a safe route to school and data on village services is inaccurate.

**Change suggested by respondent:**

Revise HELAA and other assessments using real accident statistics in this area

State what practical improvements are necessary to the surrounding roads before any development

Look at the issues regarding the surface water management of any development

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** GNLP19,20,2021 redacted - <https://oc2connect.gnlp.org.uk/a/459>

23535

Object

**Site Assessment Booklets and Studies, Housing and Economic Land Availability Assessment (HELAA)****Respondent:** Mr John Shirley [18795]**Summary:**

Allocations GNLP2019 and COL1 -HELAA assessments are seriously flawed, as an example from the GNLP allocation summary "a Transport Assessment will be needed to demonstrate how highway issues at Rectory Road can be mitigated" - yet the HELAA assessment for transport is "Green".

There are similar issues under other headings

**Change suggested by respondent:**

Completely revise HELAA assessments using real traffic and accident data. Look at how these two developments will dominate the landscape and the flood risk potential from the surface water onto surrounding properties. See the current planning application 20201627 for that; all contrary to NPPF guidelines.

How the school cannot be realistically expanded without further compromising Rectory Road's traffic issues.

State what services are within 1km of the site and the poor public transport with no buses in the evenings.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** GNLP19,20,2021 - <https://oc2connect.gnlp.org.uk/a/45v>

24481

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Silvis Development [20074]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

Policy 7.4 is not positively prepared, justified, compliant with national policy or effective as it does not consider distinguish between brownfield and greenfield land. The policy fails to prioritise brownfield development, or take into consideration brownfield land that is not infill which could make a more effective use of the land. Similarly, the policy does not address the need for enhancing the environment and improving the sustainability of existing rural businesses that may exist outside settlement limits.

Furthermore, Policy 7.4 states that small scale employment uses will be acceptable in principle within development boundaries. This is permitted through the reuse of rural buildings or through the potential expansion of existing employment sites. However, the policy does not take into consideration recent trends regarding the vast number of home working, and the need for small office space close to home for all sectors of the market. Currently, the assumption is that home working means people working from their own individual dwellings, however looking at the employment land assessment addendum 2020, no consideration has been given to the proliferation of office space and the potential for existing businesses wanting to move to less dense localities where there is more scope for incorporating employee welfare facilities and social distancing measures. As such, given the last year, it is considered the policy is unjustified in this regard. Furthermore, when coupled with the rise in entrepreneurial spirit and home businesses that have arisen during the lockdowns, there is an increased demand for small multipurpose spaces, ideally close to existing residential properties in more rural locations. The provision of such units will supplement existing rural economies in unprecedented ways, capitalising upon the radical shift of home working that the recent pandemic has caused, however the policy makes no effective or justified approach to addressing recent shifts in working.

The evidence base for employment uses and employment space was gathered in 2016 and 2017, and supplemented in 2020, based on a forecast model done in 2017. As such, it is considered that the evidence base does not adequately reflect the current circumstances as no one could have predicted the recent pandemic and the consequences for employment space. This has resulted in the proposed policy based on an unjustified strategy.

It is considered in accordance with paragraph 35 of the NPPF, that the policy does not pose an appropriate strategy taking into account reasonable alternatives. and is considered to be unjustified, unsound, not compliant with national policy and not effective.

**Change suggested by respondent:**

To make the GNLP sound in accordance with paragraph 35 of the NPPF, it is considered necessary that a further study into the implications of COVID-19 and the future of employment needs to be commissioned. Looking at rural communities, the option of providing flexible working spaces could be the key to unlocking not only the vitality but the viability of the more rural settlements. Currently the provision of large-scale employment allocations requires mass commuting to work. Instead, the creation of a policy that allows for flexibility of the smaller scale and bespoke employment uses within small settlements would allow for local people to commute sustainably (by walking, for example) thus reducing the carbon footprint, and supplementing the GNLP's aspirations of providing for a healthier, more vibrant community. Such a policy would also help support rural economies by providing for more employment opportunities locally, as well as helping retain football within existing settlements where future viability of local facilities are questionable following the national lockdowns and associated loss of earnings.

Taking the settlement of Frettenham, if the policy is not amended, then specific allocations should be considered that would facilitate growth. We can see that there are facilities in Frettenham, and sustainable transportation options available for local people, however the option to walk to work will always have a lower carbon footprint than public transport. Furthermore, through providing a small number of employment opportunities locally, we can in accordance with paragraph 83 of the NPPF, supplement the sustainable growth and expansion of the settlement through well designed new buildings, providing local jobs for local people, as well as accommodating the smaller more bespoke businesses such as the arts and crafts sector and the tech industry, which would be incongruous with larger employment site allocations. Furthermore, it is prevalent that such industries do not wish to own large scale factories in traditional employment locations. As such a dedicated policy should be provided regarding the growth of small employment opportunities in more rural locations for the more bespoke businesses, or specific allocations should be promoted, such as GNLP2076 and GNLP2078.

Additionally, it is necessary that the policy is modified in either case to take account of the availability locally of brownfield sites that may not directly fall within the settlement but are adjacent to, or relate well to the settlement boundaries in accordance with paragraph 84 of the NPPF.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

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**24478**
**Object**


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**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development**

**Respondent:** Silvis Development [20074]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

Policy 7.5 is considered not positively prepared justified, compliant with national policy or effective due to the restrictions on growth that are placed on the more rural areas of the districts. The NPPF states in paragraph 78 that "housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." Policy 7.5 does not supports this national direction, instead through proposing an allocation only approach, coupled with an ineffective windfall proposal, the policy impedes rural economies which require new development, and new residents to be sustainable. Given the GNLP does not identify allocations for growth or provide a significant policy to support needed village and rural community growth, it is considered the GNLP is not compliant with national policies and is unsound in accordance with paragraph 35 of the NPPF.

**Change suggested by respondent:**

To make the plan sound, a dedicated policy to provide clarity and facilitate rural growth is needed. Such a policy can support windfall proposals, or allow for limited development, but in either case, would supplement the existing rural economies, facilitating growth. Growth exceeding that of 5 dwellings is considered necessary to have any significant impact upon rural vitality, and given the current proposed policy would not require affordable housing contributions, is not considered to be a justified approach. Instead either a windfall policy that assesses each settlement should be proposed, or a policy which allows for a windfall scheme of up to x% of existing housing stock be allowed. This could also have in a clause that allows the standard percentage to be increased if provision is made for the developer to provide benefits for the rural community, such as provision for village shops, or new footpaths aiding sustainability.

Taking the village of Frettenham for example, if no revision to the policy is proposed, then specific allocations should be proposed. Out of the allocations that have been proposed at Regulation 18, GNLP2076 & GNLP2078 would be ideal proposals. Such a development would ensure a good proportion of growth is available which would supplement the existing local facilities in a more substantial way than ad hoc development of 3 to 5 dwellings that the current policy would allow. Such a development would aid in not only creating a more sustainable settlement, where new business can be attracted, but also secure the existing facilities with a wider customer base, especially in light of the recent economic challenges national lockdowns have created.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None



24479

Object

**Homes, 136****Respondent:** Silvis Development [20074]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]**Summary:**

Policy 7.5 is considered not positively prepared justified, compliant with national policy or effective due to the restrictions on growth that are placed on the more rural areas of the districts. The NPPF states in paragraph 78 that "housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." Policy 7.5 does not supports this national direction, instead through proposing an allocation only approach, coupled with an ineffective windfall proposal, the policy impedes rural economies which require new development, and new residents to be sustainable. Given the GNLP does not identify allocations for growth or provide a significant policy to support needed village and rural community growth, it is considered the GNLP is not compliant with national policies and is unsound in accordance with paragraph 35 of the NPPF.

**Change suggested by respondent:**

To make the plan sound, a dedicated policy to provide clarity and facilitate rural growth is needed. Such a policy can support windfall proposals, or allow for limited development, but in either case, would supplement the existing rural economies, facilitating growth. Growth exceeding that of 5 dwellings is considered necessary to have any significant impact upon rural vitality, and given the current proposed policy would not require affordable housing contributions, is not considered to be a justified approach. Instead either a windfall policy that assesses each settlement should be proposed, or a policy which allows for a windfall scheme of up to x% of existing housing stock be allowed. This could also have in a clause that allows the standard percentage to be increased if provision is made for the developer to provide benefits for the rural community, such as provision for village shops, or new footpaths aiding sustainability.

Taking the village of Frettenham for example, if no revision to the policy is proposed, then specific allocations should be proposed. Out of the allocations that have been proposed at Regulation 18, GNLP2076 & GNLP2078 would be ideal proposals. Such a development would ensure a good proportion of growth is available which would supplement the existing local facilities in a more substantial way than ad hoc development of 3 to 5 dwellings that the current policy would allow. Such a development would aid in not only creating a more sustainable settlement, where new business can be attracted, but also secure the existing facilities with a wider customer base, especially in light of the recent economic challenges national lockdowns have created.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24480

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Silvis Development [20074]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

Policy 5 states that at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom build plots. It is considered that this policy is not effective to ensure the delivery of self or custom build dwellings.

Speaking from a practical point of view, the attraction of custom and self-build dwellings lies in the flexibility of the design and layout. Given the size of the proposed allocations within the GNLP, it is fair to assume that volume house builders will be delivering the majority of sites, this means in reality that economies of scale will be used to produce standardised dwellings, where bespoke units will appear incongruous. Additionally, incorporating a small proportion of self or custom build dwellings within such schemes are unlikely to attract the individuals looking for purpose built bespoke homes. As such, the strategy is considered to be unjustified as the plan does not respond to the evidence that custom builders prefer development on smaller, more rural sites, not within large housing allocations.

The policy states that 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots unless there is no need, or plots have been marketed for 12 months and have not been sold. Given that these plots will be unattractive to self builders, it is likely any need will not be met by this policy as vacant plots will eventually be re-developed when final phases of large allocations are completed. Additionally, logistical complexities of delivering sites with multiple contractors simultaneously will further reduce the attraction for smaller self-builders.

This means that there are questions regarding the deliverability of the policy over the plan period given that an inadequate strategy has been provided that is not positively prepared. This is because the policy is not providing enough flexibility and choice to address the areas objectively assessed need, and will fail to secure delivery of a mix of sites to enable choice for self-builders. As such the policy is found to be ineffective, not positively prepared, and unjustified in conflict with paragraph 35 of the NPPF.

**Change suggested by respondent:**

To make the policy and plan sound, it is considered that a more flexible policy be proposed. Policies HOU03 and HOU05 of the Breckland Local Plan (see Annex 1) facilitate a more flexible approach that directly responds to the needs of custom/self-builders. These policies recognise the principle aspirations of self-builders and sets a favourable framework for approving self-build dwellings in small villages and hamlets outside of settlement boundaries. This is done by allowing for development in more rural locations and actively encouraging smaller sites, which are more likely to be delivered through a windfall style policy, than tying self-build plots in large housing allocations. It is considered that given the overall need for the joint authorities, that a mix of dedicated allocations in more rural locations be provided, alongside a policy that actively supports small scale self-build and custom build plots on land that relates well to existing settlements.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24482

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Silvis Development [20074]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Policy 7.5 is considered to be inconsistent with national policy as well as not being positively prepared or effective. The policy states that positive consideration will be given to custom and self-build dwellings. Although it does not provide sufficient clarity as to how it will be supported. Reading the policy at face value, the policy is split into two sections, the first sentence is part A which relates to small scale residential development, which is expanded upon through the four bullet points. Part B is the second sentence which reads "positive consideration will be given to self and custom build." The NPPF in paragraph 16 requires that "plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals." Regarding the second element of policy 7.5, there is a lack of clarity regarding the support for self and custom build dwellings. No indication is given as to where these units have to be located, unless it is meant for the policy reader to interpret that this second element is also applied to development adjacent to a development boundary or adjacent to a recognisable group of dwellings. Furthermore, the lack of an 'S' at the end of self and custom build implies that support will only be given for a single unit. As we know viability is a fundamental consideration when it comes to development, and economies of scale are more often than not necessary to facilitate development. Under the current wording of the policy, it is unclear if a scheme, for example, was to propose five or more serviced plots for custom and self-build dwellings whether this would be supported. As such this lack of clarity, is in direct conflict with paragraph 16 of the NPPF. Furthermore, given the lack of clarity, there is a clear inconsistency with national policy and questions over the interpretation and ultimately the deliverability of the aspirations of the policy, resulting in an unjustified and ineffective strategy that is not positively prepared.

### Change suggested by respondent:

It is considered necessary that the second sentence, which relates to positive consideration of custom and self-build, be revised to provide further clarity as to the aspirations of the policy. Additionally, it should be made clear where such dwellings should be located in order to receive policy support, as well as clarity regarding the quantity of self and custom build that will be supported. For example, GNLP2076 and GNLP2078 allocations both propose a number of self-build plots which help the local authority address its need to deliver service plots for self-build accommodation. At the moment it is assumed that policy 7.5 would be supportive of these schemes if they came forward, however, to undertake the necessary infrastructure such as the access road to reach the plots and make good the site for development, more than five plots would have to be delivered. As such, although the policy states that positive consideration will be given, the policy currently, if interpreted correctly, is too restrictive to actually facilitate the aspiration of the delivery herself and custom build dwellings.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24252

Object

## Horsford, Settlement Map

**Respondent:** Samantha / Guy Simpson / Watts [20059]

**Agent:** Sequence (UK) Ltd (Mr Graham Bloomfield, Land & Planning Partner) [19983]

**Petition:** 2 petitioners

**Summary:**

Sequence has been instructed to act for the Owners of Firbank, Green Lane, Horsford. The property has recently been acquired through probate and therefore no previous representations have been made to the Greater Norwich Local Plan. Firbank is a detached dwelling on a plot of 0.28ha. This includes a separate access to the east to a redundant workshop building to the south of Firbank. Removal of the workshop building would provide a sustainable site for up to 3 new homes. A Site Location Plan is enclosed (drawing reference 2021.03.22.Site.Location.Plan).

Sequence consider that the Draft Sites Plan for Horsford is not 'sound' as the approach is not justified or effective under paragraph 35, parts b&c of the National Planning Policy Framework (NPPF).

Specifically the position of the Settlement Boundary is not considered to be an appropriate strategy taking into account the reasonable alternatives.

The Horsford proposals map demonstrates an inconsistent approach to the inclusion of land within the Settlement Boundary.

Land to the east of Mill Road between Mill Lane to the south and Green Lane to the north benefits from various planning permissions and has been significantly constructed, to the extent that the majority of these properties appear on the base map for Horsford. However the status of this land is not reflected on the Draft Sites Plan, either by reference to a housing commitment, inclusion within the Settlement Boundary, or definition as a Housing Allocation. Sequence would consider that with full planning permission having already been granted, and the majority of houses constructed, an appropriate strategy would be to include this land within the Settlement Boundary. The plan is effectively already out-of-date before it has been submitted for examination and is not an appropriate strategy.

A suggested alternative to the Settlement Boundary is shown on the enclosed plan (drawing reference 2021.02.15.BR0001-1.Horsford.Amended.Settlement.Boundary).

There are a number of examples of inconsistencies throughout the Part 2 Pre-Submission Draft Sites Plan in terms of the treatment of sites with planning permission / under construction and whether they are included within the Settlement Boundary. There are a number of examples of sites under construction that are included within the Settlement Boundary such as the Draft Sites Plans for Hethersett, Poringland and Thorpe St Andrew and given that the Horsford scheme is largely complete, the sound and justified approach is to also include it within the Settlement Boundary as shown on the enclosed drawing.

As a general point, to ensure the plan is sound and based on an appropriate strategy, a consistent approach should be taken throughout the plan both to allocations and sites that have planning permission and/or are under construction. As set out under these representations for Horsford, Sequence would contend that an appropriate strategy is to include all allocations and those sites with planning permission and under construction within the Settlement Boundary. Similar representations have been made by Sequence in this regard with reference to the Draft Sites Plan for Redenhall with Harleston but there are inconsistencies throughout the Part 2 Plans.

Sequence contend that the current inconsistent approach is not an appropriate strategy - it is therefore not justified, nor effective and accordingly is not sound.

**Change suggested by respondent:**

Sequence consider that the Settlement Boundary for the Horsford Draft Sites Plan should be redrawn to include the developments that have planning permission and indeed are under construction and largely completed to the east of Holt Road. The revisions will provide a robust and defensible boundary that will endure over the plan period, reflecting the actual extent of the built up area of Horsford marked by Green Lane to the north.

These suggested revisions are shown on the enclosed drawing reference 2021.02.15.BR0001-1.Horsford.Amended.Settlement.Boundary.

This revision will ensure an appropriate strategy and therefore a justified and sound approach. The current approach is not justified, as it is not an appropriate strategy given the inconsistent treatment of both draft allocations and sites with planning permission and under construction with respect to their inclusion within the Settlement Boundary, as detailed further within the response to Question 5 above.

The revisions shown on drawing ref. 2021.02.15.BR0001-1.Horsford.Amended.Settlement.Boundary will deliver an appropriate strategy with respect to the Horsford Draft Sites Plan but similar revisions will need to be made to other Part 2 Draft Sites Plans to ensure the plan is sound overall.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 2021.02.15.BR0001-1.Horsford.Amended.Settlement.Boundary.jpg - <https://oc2connect.gnlp.org.uk/a/4c8>  
2021.03.22.Site.Location.Plan.jpg - <https://oc2connect.gnlp.org.uk/a/4c9>

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**24253**
**Object**


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**Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development**

**Respondent:** Samantha / Guy Simpson / Watts [20059]

**Agent:** Sequence (UK) Ltd (Mr Graham Bloomfield, Land & Planning Partner) [19983]

**Petition:** 2 petitioners

**Summary:**

Sequence broadly supports the purpose of draft Policy 7.5 Small Scale Windfall Housing Development to permit small-scale residential development adjacent to Settlement Boundaries or within or adjacent to a recognised group of dwellings.

However Sequence consider that the policy as currently worded is not sound as it is not justified as an appropriate strategy (National Planning Policy Framework (NPPF) paragraph 39b) or effective (paragraph 39c). Bullet point 1 of draft Policy 7.5 restricts cumulative development to 3 or 5 dwellings (dependent on the size of the Parish), over the plan period.

Sequence are concerned that this will raise significant challenges with the implementation of Policy 7.5. By limiting the amount of development over the plan period, this creates a 'first past the post' system for windfall development in a Parish, which will artificially restrict the ability for sustainable development to come forward.

On the one hand, the policy establishes that the Settlement Boundaries are not immutable. However on the other hand, in effect, once the limit of 3-5 dwellings has been met within a Parish; development that is otherwise in accordance with Policy 7.5 and sustainable in all other respects, would be refused due to previous small-scale development having already been consented. This also takes no account of the comparative merits of development proposals and sites - simply once the artificial limit has been met, any subsequent applications would be contrary to the policy as currently drafted.

Sequence are also concerned that Policy 7.5 as currently drafted will have unintended consequences whereby a number of competing schemes may be submitted in any one Parish creating challenges for Development Management and comparisons made between sites rather than judging each site on its merits and in accordance with the Local Plan.

Sequence therefore contend that this is not an appropriate strategy, and accordingly, it is not justified, nor effective, and is not sound.

**Change suggested by respondent:**

The main revision should be to bullet point 1 of Policy 7.5 so that the restriction on development over the plan period is lifted. However Sequence recognise that the aspiration of the policy is for small-scale windfall development and, therefore, that each development is restricted to 3 or 5 new homes dependant on the size of the Parish.

In addition it is noted that Policy 7.5 uses the reference 'Development Boundary' rather than 'Settlement Boundary', inconsistent with its use elsewhere within the Draft Strategy and the Part 2 Pre-Submission Draft Sites Plan.

Sequence therefore respectfully suggest that the wording of the policy is updated as follows:-

**'POLICY 7.5 – SMALL SCALE WINDFALL HOUSING DEVELOPMENT**

Small scale residential development will be permitted adjacent to a settlement boundary or on sites within or adjacent to a recognisable group of dwellings where:

- Development permitted under this policy will be no more than 3 dwellings in small parishes or 5 dwellings in larger parishes (as defined in appendix 7); and
- The proposal respects the form and character of the settlement; and
- The proposal would result in no adverse impact on the landscape and natural environment; and
- The proposal accords with other relevant Local Plan policies

Positive consideration will be given to self and custom build.'

The revision from Development Boundary to Settlement Boundary will resolve this inconsistency and prevent any confusion.

The revision to bullet point 1 will see an appropriate strategy for windfall sites to be delivered and accordingly a justified and sound approach with planning applications brought forward under this policy considered on their merits and not artificially restricted due to previous or competing proposals. This will also allow for quicker delivery of small sites to meet housing need in accordance with Policy 68 of the NPPF.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 2021.02.15.BR0001-1.Horsford.Amended.Settlement.Boundary.jpg - <https://oc2connect.gnlp.org.uk/a/4c8>  
2021.03.22.Site.Location.Plan.jpg - <https://oc2connect.gnlp.org.uk/a/4c9>

23497

Object

**Section 3 - The Vision and Objectives for Greater Norwich, 123****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to the Vision and Objectives. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that an additional allocation or contingency site is identified at Wymondham at land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23498

Object

**Delivery, Delivery Statement****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to the Delivery Statement. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that an additional allocation or contingency site is identified at Wymondham at land south of Gonville Hall Farm (Site Ref. GNLP0320).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



23499

Support

**Addressing Climate Change, Climate Change Statement****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

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**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23500

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is requested that Policy 1 includes confirmation that the circumstances identified in Paragraphs 010 and 024 of Id.2a of the Planning Practice Guidance are included in the housing target for Draft GNLP e.g. adjustments for economic growth, strategic infrastructure and to meet affordable housing needs. It is also requested that an additional contingency site is identified at Wymondham to address low housing delivery rates if that occurs in the future.

**Legally compliant:** Yes**Sound:** No**Comply with duty:** Yes**Appear exam:** Written Representation**Attachments:** None

23502

Support

Policy 2 Sustainable Communities, Policy 2 Sustainable Communities

Respondent: Mrs Janet Skidmore [19326]
Agent: Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]

Summary:

[Redacted]

Change suggested by respondent:

[Redacted]

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

23503

Support

Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement

Respondent: Mrs Janet Skidmore [19326]
Agent: Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]

Summary:

[Redacted]

Change suggested by respondent:

[Redacted]

Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Appear exam: Not specified
Attachments: None

23504

Support

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**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

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**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23505

Support

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**Policy 5 Homes, Policy 5 Homes****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

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**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23506

Object

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**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes**
**Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

No specific modifications are required to Policy 7.1 However, it is requested that an additional contingency site is identified at Wymondham at land south of Gonville Hall Farm (Site Ref. GNLP0320).

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23508

Object

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**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns**
**Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is requested that Policy 7.1 includes a development strategy for housing at Wymondham beyond 2026. It is requested that Draft GNLP includes a commitment and timetable to submit a review of the Wymondham AAP or Draft GNLP allocates additional housing sites or a contingency housing site in Wymondham to be delivered from 2030 onwards.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23509

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is suggested that the timescales for the delivery of new settlements, the viability and deliverability of new infrastructure, and the ability of these types of developments to provide policy compliant levels of affordable housing, should be fully understood and assessed before they are considered as an option for a future GNLP. No modifications are requested to Policy 7.6.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

23511

Object

**Wymondham, 4.56****Respondent:** Mrs Janet Skidmore [19326]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

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**Change suggested by respondent:**

It is requested that land south of Gonville Hall Farm in Wymondham (Ref. GNLP0320) is identified as an additional allocation or a contingency site in Draft GNLP and is reassessed as reasonable alternative site to meet future development needs.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** 4102\_107\_A\_Concept Masterplan\_Email.pdf - <https://oc2connect.gnlp.org.uk/a/44g>  
 Skidmore - GNLP Reg18 Reps HELAA (2016) Site Assessment Matrix.pdf -  
<https://oc2connect.gnlp.org.uk/a/44h>  
 Skidmore - Sustainability Assessment Table GNLP reg 19 Feb 2021 update.pdf -  
<https://oc2connect.gnlp.org.uk/a/44x>

24436

Object

**Aylsham, Settlement Map****Respondent:** Kelvin Sloper [20012]**Petition:** 2 petitioners**Summary:**

Regulation 18 stated that Aylsham would have one site put forward for consultation. Regulation 19 states there are two sites and there has been no consultation on the changes.

Regulation 19 has not considered the impact of two sites on towns infrastructure, including roads, utilities, schools and health facilities. Is contrary to Aylsham's Cittaslow status.

**Change suggested by respondent:**

Full consultation on impact of changes i.e. TWO sites. This will enable proper feedback and best practice.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Not specified

**Attachments:** None

23324

Object

**Aylsham, 4.1****Respondent:** Mrs Karen Smith [19833]**Summary:**

The display last year in Aylsham town hall as part of the consultation under reg 18 referred to and dealt with only one site relating to 300 new homes. The goal posts have been moved and reg 19 now shows two sites and 550 homes. This is unlawful. There has been no consultation with residents or town council on this changed plan - neither is it sound. No consideration has been given to the increased impact on utilities, schools, doctors, dentists, public transport, roads, social and environmental affects. There will also be an increased carbon footprint for the town to consider.

**Change suggested by respondent:**

This plan for two sites and 500 homes should be withdrawn immediately.

It is outrageous and illegal to make changes to the original plan without having consulted residents on this. The changes are not minor, in any way, and the plans are substantially different to those put before Aylsham residents as part of the consultation process. It is not legally compliant and I am shocked that local government can assume it is above the law and push this through on unsuspecting residents who are more out of touch during a pandemic!

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23886

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Mr Michael Smith [19961]**Summary:**

The proposal to build on site GNLP0605 will place unacceptable pressure on local road network. The area already becomes heavily congested at peak periods and poses a danger to pedestrians. The site is understood to contain ancient hedgerow and this doesn't appear to be adequately addressed in the plan. The plan should also be revised in light of recent permission to develop site GNLP0275. Foulsham has VERY limited amenities, employment opportunities and no bus service.

**Change suggested by respondent:**

GNLP0605 is not a suitable site for development and the site assessment in the plan is inaccurate and flawed.

**Legally** No

**compliant:**

**Sound:** No

**Comply with** No

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

24345

Object

**Policy REP2, REP2 Policy****Respondent:** Mr Norman Smith [13852]**Summary:**

The 2016 REP2 site was allocated for a mixed development of residential and employment. It was suggested that it would accommodate approximately 20 homes, B1 and B2 employment uses.

Paragraph 5.57 in the emerging GNLP has changed this figure to 35 homes. Planning Permission Ref no.20180963 in fact shows 16 assisted flats and 15 assisted bungalows, together with a 60 bed carehome. The occupancy figure, including the carehome would be 122 persons, which would put added pressure on the local infrastructure, particularly on the GP surgery.

Together with the recommended 100 dwellings on REP1 in the GNLP, the combined total of homes in REP1 and REP2 is 131. This figure excludes accommodation in the proposed care home on REP2.

The figure of 155 dwellings for Reepham between 2018 and 2038 is increased to 166, made up of 100 dwellings on REP1, 31 dwellings on REP2, and 35 dwellings, taking account of existing planning permissions.

Clearly, the proposed 141 dwellings on REP1 are unacceptable under PA 20200847 and the 100 dwellings on the emerging GNLP REP1 site must also be considered unsound.

Site REP2 is being developed at the moment, but not in accordance with Policy REP2 which still states approximately 20 homes. The GNLP for REP2 is unsound as paragraph 5.57 is at variance with the actual Policy REP2

The existing town infrastructure would be unable to cope, if development on REP1 is also taken into account.

**Change suggested by respondent:**

Development of REP1 has started on site. The retail shop and parking is complete.

Planning Application 20180963 has received consent for 15 assisted bungalows, C2, 16 assisted flats C2, and a 60 bed carehome, C2, an assembly room C2, a clubhouse C2, offices Ba, and associated parking.

This development is in excess of Policy REP2 and will put extreme pressure on the infrastructure of Reepham, especially if development on REP1 comes to fruition.

**Legally** Not specified

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Written Representation

**Attachments:** GNLP REP1 Representations continued.doc - <https://oc2connect.gnlp.org.uk/a/4dg>

24344

Object

**Policy REP1, REP1 Policy****Respondent:** Mr Norman Smith [13852]



**Summary:**

The allocated site REP1 is carried forward in the emerging GNLP. The undetermined PA 20200847 was contrary to the 2015 development plan. The contraventions to policy were that community facilities were not provided on the site, and also that the provision of the 141 dwellings were outside the Reepham Settlement Boundary. The GNLP still proposes 100 dwellings outside the existing boundary, and as such is unsound.

Section 38(6) of the PCPA (2004) states that applications must be determined in accordance with the Development Plan. Development, outside of a settlement limit, will be permitted, provided it does not result in any adverse impacts.

Development on REP1 has obvious adverse impacts on the character of Reepham, and on its surrounding countryside. These negative impacts are the loss of two greenfield sites which will impact on biodiversity, and wildlife, including nearby protected badger setts. The creation of a suburban estate near to the Broomhill Meadows CWS, and in close proximity to a designated SSSI at Whitwell Common will have an incongruous visual impact on this rural area. The site slopes down to this area of special conservation and would require the installation of a pumped foul drainage system, up to the mains drain in Broomhill Lane. This would be a 24/7 pumped non-gravity system which will only add to the creation of carbon emissions.

Development of this site will be in conflict with the NPPF definition of sustainability. The GNLP does not place enough emphasis on climate change and fails to acknowledge how public lifestyles have changed since covid -19. This greenfield site is much used by walkers and cyclists. Access would require a new suburban road, separate new footpaths and a cycle track. In the process, trees and hedges would be removed. Landscape mitigation by using saplings is of little help, but established trees and hedgerows play an important role in reducing harmful carbon emissions.

See attachment for continuation of representation

**Change suggested by respondent:**

Inclusion of this site in the emerging GNLP is considered unsound, therefore no modifications are suggested.

All Local Planning Authorities are currently demonstrating at least a 5 year supply of land for housing. This site should not be included in the GNLP.

There are a number of adverse impacts on Reepham that would result from the development of REP1

The 2 green field sites would be lost, outside the town settlement boundary.

The form of residential development would be incongruous with the character of the surrounding countryside

The single access road is not compatible with the existing congested movement of traffic in Reepham.

The sloping form of the site, away from existing services will require a pumped drainage installation, and surface water is at risk of draining into the nearby SSSI.

Constraints around road access will require the loss of carbon-reducing hedgerows, trees, biodiversity and wildlife.

Local infrastructure, including schools, GP surgery, drainage treatment are insufficient to cope with a 100 dwelling development

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** GNLP REP1 Representations continued.doc - <https://oc2connect.gnlp.org.uk/a/4dg>

23327

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Mr Stuart Smith [19371]**Summary:**

6:35 School lacks capacity so your answer is to build more and make it bigger, then you will give permission for even more homes! You say number of facilities, what are they? Tiny village shop and a pub? No doctors, dentist, vets, no bus service or anything. If you live in Foulsham you NEED a car so a new home owners must have their own transport. There is no safe road access to the new site, access through a built up exsisting estate.

**Change suggested by respondent:**

It's obvious it's a lie, you say small number of new homes but it's very obvious that it won't rest there and you will continue to expand the village and totally ruin it. The access to the new planned site is totally wrong, you want all the traffic to go through a tiny estate road with parked cars and plenty of children in the area. It's not safe, then they will need to pull out of the estate onto another small road, the infrustrature is not there for it.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23457

Support

**Taverham, Settlement Map****Respondent:** Mr Stuart Smith [19873]**Summary:**

I would like to express my support of the soundness of continuing to protect the Wensum Valley and rejection of any plans that encroach into it beyond previously agreed settlement boundaries. I am particularly please that the Wensum Valley's status as an SAC and also SSI has been recognised.

**Change suggested by respondent:**

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**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Not specified

**Attachments:** None

23512

Object

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**Policy 0596R, 4.8**

**Respondent:** Mr Steven Smyth [18354]

**Summary:**

This Norwich Rd site is not legally compliant as there was no consultation on Aylsham having two sites.  
Also not sound because of no consultation or consideration of infrastructure or environmental damage.

**Change suggested by respondent:**

This second site from Reg19 should be scrapped as it not sound or legally compliant.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23513

Object

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**Policy 0596R, 4.9**

**Respondent:** Mr Steven Smyth [18354]

**Summary:**

This site is neither legally compliant or sound because Reg 18 stated only one site not two and fails to consider the green environment and the town's infrastructure.

**Change suggested by respondent:**

The Norwich Road site plan should be withdrawn as it not sound or legally compliant.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23507

Object

**Policy 0596R, 4.7****Respondent:** Mr Steven Smyth [18354]**Summary:**

Reg 18 states that Aylsham would have one site and that was put forward for consultation. Reg 19 has stated two sites which was never consulted on. A Norwich Rd site and the traffic it would generate with two side roads not far apart and metres from the already very busy Norwich Road roundabout would not enhance the Gateway to a Market Town and goes entirely against our Governments carbon footprint and Green future plans.

**Change suggested by respondent:**

Reg 19 plan for Norwich Rd sites should be rejected as it was not consulted on therefore illegal and not sound because of carbon footprint damage and the town does not have the infrastructure.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23514

Object

**Policy 0596R, 4.10****Respondent:** Mr Steven Smyth [18354]**Summary:**

These plans are not sound as they have taken ideas from "Shaping Aylshams Future" and used them out of context . Park and ride or cycle or walk all adds up to a lot of extra traffic, not good for the health or environment of our Medieval Market Town.

**Change suggested by respondent:**

The Reg19 plan for Norwich Rd site should be scrapped as it is not sound or legally compliant.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23515

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr Steven Smyth [18354]**Summary:**

The site on Norwich Road is not legally compliant as Reg18 stated that Aylsham would have one site and that was put forward for consultation. Reg19 states there will be two sites but that has never been consulted on and therefore not legal.

The Reg19 plan is not sound because it hasn't considered the needs of the town's infrastructure, rural environment and the Government's carbon neutral plans.

**Change suggested by respondent:**

The Reg19 plans for the Norwich Road site need to be scrapped because they are neither legal or sound.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23516

Object

**Policy 0596R, 4.7****Respondent:** Mrs Maria Smyth [19807]**Summary:**

The Regulation 19 plan has not been consulted on with the residents of Aylsham and this makes it legally unsound. Regulation 18 was for 250 dwellings on ONE site at Burgh Road which was already going to cause significant pressure on the town's infrastructure. Any further development should have been thoroughly consulted on with the residents of Aylsham and Aylsham Town Council. This has not been the case with Regulation 19 and this plan should be shelved immediately.

**Change suggested by respondent:**

Regulation 19 needs to be scrapped. The plan is not sound or legally compliant.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23713

Object

**Policy 0596R, 0596R Policy****Respondent:** Mrs Maria Smyth [19807]**Summary:**

There was no consultation on Regulation 19 with the residents of Aylsham or the Town Council. This makes this regulation illegal. The proposal is unsound as it proposes two sites for development and more than double the houses suggested in Regulation 18. There has been extensive development already in our town with two housing estates recently completed with no infrastructure put in place to support it ie schools, doctor's surgeries, dentists etc.

**Change suggested by respondent:**

The plan needs to be scrapped as it is neither legal nor sound.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23479

Support

**Infrastructure, 141****Respondent:** Sport England (Mr Philip Raiswell, Planning Manager) [13516]**Summary:**

Sport England supports the development of improved facilities for walkers and cyclists, as it encourages people to be more active in their daily life. This is one of the key principles of Sport England's Active Design guidance.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23481

Support

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**Environment, 149**

**Respondent:** Sport England (Mr Philip Raiswell, Planning Manager) [13516]

**Summary:**

Sport England supports the development of multi functional green infrastructure, which will improve opportunities for active travel and leisure, in line with our Active Design guidance.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23604

Support

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**Communities, 132**

**Respondent:** Sport England (Mr Philip Raiswell, Planning Manager) [13516]

**Summary:**

Sport England supports the development of sustainable communities with good access to open space, sports facilities, and better opportunities to enjoy healthy and active lifestyles.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23605

Support

**East Norwich, 335****Respondent:** Sport England (Mr Philip Raiswell, Planning Manager) [13516]**Summary:**

Sport England sees East Norwich as an opportunity to improve social infrastructure and design a site that meets Sport England's active design principles:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23606

Support

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Sport England (Mr Philip Raiswell, Planning Manager) [13516]**Summary:**

Sport England supports the proposed growth agenda, but would wish to see a commitment to on-site opportunities for sport and physical activity within the Growth Triangle

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23472

Object

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**Policy 0596R, 0596R Policy****Respondent:** Eileen Springall [19882]**Summary:**

Although Aylsham Town Council, residents of the town and its District Councillors were consulted on regulation 18 concerning one site for 300 homes there has been no such consultation with regard to an additional site for a further 250 homes. Since there would have to be significant changes to the infrastructure referred to in regulation 18 again the original consultation was insufficient to sustain the new regulation.

**Change suggested by respondent:**

Obviously there needs to be a proper consultation giving due regard to almost doubling the number of homes now envisaged.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

24317

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** N Steele [20066]

**Agent:** La Ronde Wright (Lewis Matthews) [16578]

**Petition:** 2 petitioners

### Summary:

Policy 7.4 and Policy 7.5 Windfall sites

The NPPF states in paragraph 78 that "housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." The GNLP does not propose a policy that supports this, instead through proposing an allocation only approach, and exceptionally limited windfall proposals through policy 7.5 the GNLP directly restricts growth of local rural economies in a manner inconsistent with the NPPF. The local rural economies require new development and new residents, to thrive. The Draft GNLP does not identify opportunities or provide a significant policy to support village and rural community growth in a meaningful manner, instead it actively restricts this, in conflict with paragraph 78 of the NPPF. Consequently, it is not consistent with national policy and is in conflict with paragraph 35 of the NPPF.

Further, Policy 7.5 is not positively prepared or justified as it does not take account of the disparate characteristics of the 'smaller parishes' and 'larger parishes' in Greater Norwich and the Norwich urban area. Within some of the larger parishes it is clear that where there are highly sustainable settlements up to 9 dwellings could be accommodated sustainably.

The recently published Building Better, Building Beautiful Commission "Living with Beauty" report and the Government's Design Code Template encourage development that respond to local area characteristics.

### Change suggested by respondent:

Policy 7.5 should be modified to include a new category of parishes: those which are within the Norwich urban fringe, with this category permitting at least up to 9 dwellings.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

23542

Object

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**Foulsham and Themelthorpe, Settlement Map****Respondent:** Mr Richard Stilgoe [16179]**Summary:**

I feel GNLP0605 is unsuitable as other sites within the village have been allocated for housing that meets the requirement for the total wished for in the plan.

**Change suggested by respondent:**

Remove GNLP0605 from the plan of potential sites for Foulsham.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23539

Object

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**Foulsham and Themelthorpe, 6.35****Respondent:** Mr Richard Stilgoe [16179]**Summary:**

Assuming the description regarding the school site being not landlocked and capable to be expanded, I believe this to be misleading as there is only a front gated entrance to the school, it has a sports field but this is surrounded by private land/properties, fencing and hedges.

**Change suggested by respondent:**

The description to this first point regarding the school is misleading and requires amendment. It is as if this is all being assumed and hasn't been viewed/inspected.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23540

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Mr Richard Stilgoe [16179]**Summary:**

Plan for Foulsham has not been amended to take into account the recent approval of a large brownfield site planning application for 12/15 new build within the village boundry, Blyth's old builders yard, Claypit Road.

**Change suggested by respondent:**

The plan requires amending to take this recent action into account and that with the additional small site builds and the allocation of housing in Claypit Road this almost totals the requirement housing wished for in the GNLP for Foulsham.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23541

Object

**Foulsham and Themelthorpe, 6.37****Respondent:** Mr Richard Stilgoe [16179]**Summary:**

I believe the planned allocation process for the land marked GNLP0605 is flawed as no consideration has been taken regarding the hedgerow that borders this land. The hedgerow marks the village boundary, also the boundary to the village conservation area. In my opinion it may also have and historic significance as the hedgerow seems to be marked on the Enclosures Act map retained by Norfolk County Council, Dated 1813. Government legislation regards a hedgerow planted pre 1850 as of 'Importance' and the GNLP does not show this being taken into account.

**Change suggested by respondent:**

The above comments in the plan regarding GNLP0605 fail to take into account that hedgerow would be required to be removed as the only access to this allocated land is via Aubrey Rix Close. There is also a fence that would have to be removed, but is not landowners property and that the intrusion, disruption and dangers of building traffic though the narrow street is also being overlooked. The comments above seem to be too vague lacking in detail and hence, makes the plan for this site flawed.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23764

Object

**Policy 0605, 0605 Policy****Respondent:** Mr Richard Stilgoe [16179]**Summary:**

Access through Stringers lane and Aubrey Rix close would be unsuitable due to narrowness of roadway and that pavements are also at road level. Construction and future traffic loads would be a danger to pedestrians, especially as you say that site could be expanded in future. Children also play in the street in these two roads (just like the old days), and that is because they and their parents feel it is safe to do so. I feel there would be an increased chance of accidents. Also the junction between Stringers and Foundry Close is dangerous due layout.

**Change suggested by respondent:**

I think this is a bad idea as I know that a planning application was turned down for the field to the north of this site due to access, and if planning is allowed, this gives an opportunity for access to that field, further expansion and more traffic on totally unsuitable roads, being a danger to residents of the lane and closes involved.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23545

Object

**Policy 0605, 6.38****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

The planning directive misleads the application, the proposal states that there is a safe pedestrian route to the school, this is untrue as the route to the school would not be safe due to increased volume of traffic, pavements are level with a narrow road through Aubrey Rix Close and Stringers lane, joining an unmarked bottle neck junction and then onto a busy high street which is obscured by many parked cars.

**Change suggested by respondent:**

Information needs to be corrected as at the present time it is flawed

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23546

Object

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**Policy 0605, 0605 Policy****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

The access to GNLP0605 is dependant on gaining access through Aubrey Rix Close, currently there is no access, a fence and an historic hedgerow runs right across the necessary access and the current owner of GNLP0605 does not own this access. Even if access was available, it would not be suitable and highways need to survey and the current infrastructure, which is already maxed out.

**Change suggested by respondent:**

The hedgerow needs to be mentioned and surveyed , possible part of enclosures act. Highways need to survey current traffic issues/concerns

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23547

Object

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**Policy 0605, 0605 Map****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

The current proposed planning, site suitability is flawed as there is no access, no safe route to school, and the site has been used in the past for arable use livestock grazing and fodder, etc Also there is no mention of the conservation area, wildlife and protection against development outside the development boundary. The plans are flawed.

**Change suggested by respondent:**

The site needs to be marked as unsuitable, other brownfield sites in the village have recently been passed so therefore there is no need for further development until 2038.

**Legally** No**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23548

Object

**Foulsham and Themelthorpe, 6.35****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

The school is landlocked surrounded by private land, the only access is through the school gates, on the busy high street, which is very narrow, only 1 car width? so how could the school be expanded, this information is incorrect and therefore the planning directive is flawed.

**Change suggested by respondent:**

No changes can be made there is no way the school could expand, therefore this cannot be used as a reason to allow development of GNLPO605 as the information is false.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23549

Object

**Foulsham and Themelthorpe, 6.37****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

Currently the proposed site has no access, the only access is through Aubrey Rix close, currently an Historic Hedge Row, runs right across this proposed access, concerns have been raised separately. Planning has totally dismissed this and all other conservation concerns, ie the fact that it is a conservation area, and outside the development boundary, which means that no measures to protect the environment and landscape intrusion have been considered, in fact the proposed planning and development of GNLPO605 has made no reference to these issues, therefore the plans are flawed.

**Change suggested by respondent:**

The site should be removed from the list of proposed sites.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23550

Object

**Foulsham and Themelthorpe, Settlement Map****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

The proposed site has no access and this cannot be addressed, Even if the hedgerow was allowed to be removed, which would have to be passed by central government, the route proposed is not suitable either by pedestrians or motorists, it is currently not safe, and any additional increase in traffic ie potentially 50 cars, would increase the risk of an accident, that is already waiting to happen, many near misses at the junction between Foundry Close and Stringers Lane, the infrastructure is poor, and there is no room to improve this. The proposed planning development of GNLP0605 is flawed.

**Change suggested by respondent:**

The proposed site GNLP0605 is unsuitable and should be removed.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23574

Object

**Foulsham and Themelthorpe, 6.36****Respondent:** Mrs Sharon Stilgoe [15688]**Summary:**

12 new homes have just been agreed at Blythes yard Claypit Road in the Village this meets the current allocation needed, when added to existing allocation by the GNLP and planning directive therefore information is incorrect and flawed no further development needed until 2038 , this is backed up by CPRE and the fact that the proposed site is in a conservation area.

**Change suggested by respondent:**

GNLP0605 should be removed as housing allocation no longer needs to be met. Information in the plan is incorrect and has been signed off by head of planning. Planning is not compliant with GNLP

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None



23938

Object

**The Vision for Greater Norwich in 2038, 126****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]**Summary:**

The Vision for Greater Norwich in 2038 and the Objectives within the plan should be updated to incorporate reference to the 2050 commitment to become net zero carbon by 2050, and in particular to the interim 2030 carbon reduction commitment (-68%). It should also acknowledge the implications of these commitments for planning within your district, which are extremely significant. It should also summarise the duties around carbon auditing and budgeting early and prominently within the plan, to set the context for the policies which follow. The commitment to reduce emissions to nothing within 30 years needs to influence all policies, and all policies should be assessed for compliance against this overarching objective.

The Greater Manchester Spatial Framework approaches this well, page 76 – 78 and Policy GM-S 2, though Greater Manchester are committed to carbon neutrality ahead of the 2050 deadline, in line with their Climate Emergency Resolution. This is based on analysis carried out by the Tyndall Centre<sup>8</sup> which considers baseline emissions and sets a carbon budget in line with the Paris Climate Accord, and a 2038 target for carbon neutrality.

We make the following comments and suggestions about the following objectives on page 39 of the draft plan:

The economy objective should be more explicit about the objective carbon emission reductions which are required by national legislation.

We recommend that your objective in relation to infrastructure provision is strengthened to reflect the scale of infrastructure provision required to deliver a zero carbon future, and the scale of the transport modal shift required for a net zero future, reflected in the governments decarbonising transport strategy and the Prime Minister's 10 point plan for a green industrial revolution

See attachment for further information

**Change suggested by respondent:**

The economy objective should be more explicit about the objective carbon emission reductions which are required by national legislation.

We recommend that your objective in relation to infrastructure provision is strengthened to reflect the scale of infrastructure provision required to deliver a zero carbon future, and the scale of the transport modal shift required for a net zero future, reflected in the governments decarbonising transport strategy<sup>9</sup> and the Prime Minister's 10 point plan for a green industrial revolution<sup>10</sup>:

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>

23939

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]**Summary:**

We are concerned about the scale of development proposed for village clusters and the additional 5000 homes, on top of existing commitments.

Paragraph 384 on village cluster sites states that “the village clusters cover the remaining areas of Broadland outside the Norwich fringe, main towns and key service centres”, implying that the village clusters are not well serviced by shops, services and public transport, raising concerns that these housing developments will be highly car dependent. This aspect of the policy doesn't seem to be compatible with your objectives to significantly reduce carbon emissions and give communities good access to jobs, services and facilities.

The plan does not provide any specific measures to prevent these housing developments from being car dependent in use.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>

23940

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]**Summary:**

Policy 2 tries to fit too much into a single policy, with the result that detail to enforce the policy is lacking. There may be benefit from retaining as a high-level overarching policy version of policy 2 (like policy CCS1 below from Bristol City Council) and then developing more detailed policies addressing specific aspects of climate mitigation or adaptation, for instance zero carbon policies where necessary.

Whilst policy 2 contains elements of climate adaptation (clauses 1, 8 and 9 below), no-where in the plan are these elements brought together into a coherent climate adaptation policy, and the policy is not detailed enough or assertive enough to allow development management officers to negotiate for meaningful responses or refuse planning applications which are not climate adapted. For example, the policy states that development proposals are expected to reduce overheating, but no further detail is set out detailing how practically developers are expected to address this through site or building design. It would therefore be extremely difficult for development management officers to refuse planning applications on this basis.

See attachment for further comments on Policy 2

**Change suggested by respondent:**

Whilst paragraph 10 of policy 2 above is a good start, it could go much further to reduce carbon emissions from new development. We acknowledge that the planning White Paper proposes and Future Homes Standard proposes interim standards to be introduced in 2020 and stronger regulations which would come into force in 2025, requiring an 80% improvement over building regulations. We're concerned that these proposed regulations will be weaker than policies already in place in some local authorities, would permit development to be built with lower fabric standards than the existing 2013 building regulations. Additionally the 2025 standards will not result in new development being fully de-carbonised, assuming instead that the remaining carbon emission reduction will be delivered by the de-carbonisation of grid electricity. There is no guarantee that electricity from the national grid will be fully decarbonised, or the period over which this will happen.

We would also point out that the future Homes Consultation<sup>11</sup> proposes requiring interim carbon emission reductions of 31% beyond existing building regulations from 2020. This should be the baseline for policy formation.

We would encourage you to go further therefore and toughen your policy stance to require new development to be net zero carbon. The most ambitious and all-encompassing zero carbon policy of which we are aware is that from the draft London Plan, which has now gone through examination without major amendments.

View attachment for Example.

We strongly welcome the reference to maximising the use of "local energy networks and battery storage" however the policy is not clear how this statement relates to new developments, other than standalone projects. The wording should be clarified to be clearer whether and how new developments (for example significant housing developments) are expected to incorporate these technologies. The inclusion of battery storage within significant new housing and mixed use developments would be very helpful in alleviating constraints in the electricity distribution grid and enabling greater utilisation of renewably generated electricity.

See attachment for further information

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>

23941

Object

**Introduction, 224****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]**Summary:**

The supporting text of the plan states at paragraph 224:

“To support emissions reductions, it is also important to promote modal shift to active travel and clean public transport, and to support electric vehicle use in a time of rapid technological change.”

This is good, but the text and policy aspirations could go much further, encouraged by a number of excellent policy publications from central government this year which should be referenced in the supporting text. In particular, it could be explicit on the scale of modal shift needed and reduction in car miles needed to get to net zero emissions.

**Change suggested by respondent:**

The text and policy aspirations could go much further, encouraged by a number of excellent policy publications from central government this year which should be referenced in the supporting text. In particular, it could be explicit on the scale of modal shift needed and reduction in car miles needed to get to net zero emissions.

View attachment for more detail

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>

23942

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]

**Summary:**

We suggest below revised wording which would align the first part of policy 4 closer to these government policy documents. Policy 2 should also be aligned with these policy documents.

## Policy 4 – Strategic Infrastructure Transport

## Transport

Transport improvements will support and embrace new technologies and develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport.

Transport infrastructure will be brought forward to support the development aims of this plan. A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period with half of all journeys in towns and cities being cycled or walked by 2036.

To achieve this major development shall incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure commensurate with the scale of development and trip generation and designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is prioritised, less use is made of cars and space is used more efficiently and attractively. Development is to be designed around the principle of presumed access on foot, by bike and by public transport..

[View attachment for full details](#)

**Change suggested by respondent:**

We suggest below revised wording which would align the first part of policy 4 closer to these government policy documents. Policy 2 should also be aligned with these policy documents.

## Policy 4 – Strategic Infrastructure Transport

## Transport

Transport improvements will support and embrace new technologies and develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport.

Transport infrastructure will be brought forward to support the development aims of this plan. A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period with half of all journeys in towns and cities being cycled or walked by 2036.

To achieve this major development shall incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure commensurate with the scale of development and trip generation and designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is prioritised, less use is made of cars and space is used more efficiently and attractively. Development is to be designed around the principle of presumed access on foot, by bike and by public transport..

[View attachment for full details](#)

**Legally Not specified**

**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>**23943****Object****Flood Risk, Map 3 Fluvial and Tidal Flood Zones****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]**Summary:**

Whilst the area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coastal authorities to the east and the rivers running through the area to the sea mean that flooding and sea level rise is a significant risk.

We note that the Strategic Flood Risk Assessment takes into account the impact of climate change, however the SFRA dates from 2017 and references Environment Agency guidance<sup>23</sup>.

The allowance for sea level rise doesn't appear to align with the Environment Agency's recommended approach. Figure 1 from your Strategic Flood Risk Assessment (figure 5 below) shows a single scenario with a cumulative sea level rise of 1.21m to 2115, where-as the Environment Agency advise (figure 6 below) is to plan for 2 scenarios, a cumulative sea level rise of 1.20 and 1.60.

**Change suggested by respondent:**

-

**Legally** Not specified**compliant:****Sound:** No**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>**24528****Object****Appendices, Appendix 3 Monitoring Framework****Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]

**Summary:****Carbon Accounting / Auditing and soundness of plan**

We note from the Agenda papers for the 7th December 2020 GNDP Board meeting that the GNDP have decided not to use local carbon targets and monitoring as suggested by some consultees to a previous consultation. Table 2 of these GNDP agenda papers, summarising

substantive changes to the plan since its previous iteration, states that there would be:

No change to the monitoring for climate change as it is neither possible nor desirable to set up plan specific monitoring.

Contributing to lowering emissions to help meet targets nationally reflects the role local plans can play among many other plans and initiatives in tackling climate change.

We do not agree with this analysis.

The Planning and Compulsory Purchase Act (section 19) and the NPPF (Paragraph 148 and 149) require Local Plans to be carbon audited and to achieve radical carbon emission reductions in line with the Climate Change Act (upgraded to a 100% requirement by 2050).

Without carbon auditing, it is not possible to demonstrate that the plan can achieve radical emissions cuts aligned to the Climate Change Act. The UK government has also recently announced a new ambitious target

committing to reduce the UK's emissions by at least

68% by 2030, compared to 1990 levels. This will be the UK's Nationally Determined Contribution (NDC) under the Paris Climate Agreement.

This Section 19 statutory duty has more powerful implications for decision-making than the NPPF, which is guidance, not statute. Where Local Plan policy is challenged on the grounds of viability, for example, a local authority must make clear how the plan would comply with the duty if the policy were to be removed. This legal duty on mitigation (carbon reduction) also implies compliance with the provisions of the target regime (the trajectory to net zero) of the

Climate Change Act.

Paragraphs 1 and 7 of the online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides further detailed interpretation of the NPPF requirements. Further clarification is provided in a legal briefing<sup>3</sup>

prepared by the Royal Town Planning Association (RTPI), the Town & Country Planning Association (TCPA) and Client Earth, which states that local plans are required to

demonstrate how their policies are in line with the legally binding carbon emission reduction targets in the Climate Change Act. Local Plans are to:

- Take into account baseline emissions
- Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios
- Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050.

The plan does not comply with these requirements, and is not legally sound in terms of its climate change mitigation policies and duties.

See attachment for further details

**Change suggested by respondent:**

The evidence base should provide an overall carbon budget for the district to 2050, consistent with the updated Climate Change Act. It should show baseline emissions and the impact of development and mitigating policies on this emission curve. The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. To the extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years.

Where local authorities have followed the process of carbon auditing their plans set out in the NPPF and Planning Practice Guidance, the conclusions are often that it would be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for very ambitious planning policies around building performance. Such an approach also provides evidence to support proactive and supportive renewable energy policies as essential.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>

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**24529**
**Object**


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**Addressing Climate Change, Climate Change Statement**

**Respondent:** Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]



**Summary:****Approach to reducing carbon emissions**

Whilst the plan does discuss tackling and adapting to climate change it should be strengthened significantly to reflect recent developments. In summer 2019 the Climate

Change Act was upgraded to commit the UK to net zero emissions by 2050, but the plan makes only cursory reference to this. The 2018 IPCC (Intergovernmental Panel on Climate Change) report released in October 2018 revealed the true dangers of a global temperature

rise of 2°C, which are far worse than we thought. This report states:

Beyond a 1.5°C rise the risks of drought, floods, extreme heat and poverty for hundreds of millions of people are predicted to significantly increase.

The net zero commitment demands wholesale changes in how we plan our society, as summarised in the IPCC report:

“The challenge of avoiding catastrophic climate breakdown requires rapid, far-reaching and unprecedented changes in all aspects of society”

The IPCC report underlines the need for more radical and urgent carbon reductions and advises that to limit us to a 1.5°C global temperature increase, greenhouse gas emissions have to be reduced by 45% from 2010 levels by 2030, and we need to reach carbon neutrality (reduce emissions by 100%) by 2050.

The IPCC report comments:

“The challenge of avoiding catastrophic climate breakdown requires rapid, far-reaching and unprecedented changes in all aspects of society”

The approach in the local plan appears to be largely to leave carbon emission reductions to central government. Whilst central government is doing much to reduce carbon emission reductions, the UK is not on track to achieve an 80% reduction in carbon emissions by 2050,

still less the new commitment to bring emissions down to net zero by 2050. As stressed in the committee on climate change report “Local Authorities and the Sixth Carbon Budget”, local authorities have a vital role to play in adding to what central government is doing, and

local authority action plans represent the ‘locally determined contributions’ to the national Net Zero target.

The IPCC report, the Climate Change Act and the legal duties on local planning authorities around climate change mitigation and adaptation mean that climate change needs to take a more central role within Local Plans, and Local Plans need to take a more rigorous approach to bringing forward development which is consistent with and moves very quickly towards a

zero carbon world, with radical changes set in motion well within the lifetime of your plan. The gradualist approach set out in the plan is not equal to the scale and rate of change required. The challenge to entirely de-carbonise our society also demands that all other policies be tested against this objective.

See attachment for further information

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** Full Representation - <https://oc2connect.gnlp.org.uk/a/476>

24435

Object

**Policy 0596R, 0596R Policy****Respondent:** Margaret Summerhill [20011]**Summary:**

I am writing to express my objection to the GNLP's Plan 0596R for the land adjacent to Norwich Road being proposed for rapid residential development.

The reason for my objection is that at a Joint Public Consultation with Aylsham District Council in 2018 a Planning Application for 300 dwellings for Aylsham was approved but no further developments were to be allowed until infrastructure was improved to support such additional building.

Now the GNLP has apparently approved a plan allow the building of a further 250 houses to be built at the same time as the original 300. Indeed the latest press story is that this number could be increased to 780 in total.

I find this totally unacceptable.

Aylsham is small market town which has already had two large developments only recently completed and this latest proposal appears to have been approved by the GNLP before any of the necessary changes to the infrastructure have been carried out. I would have thought that the Town Council, who understand the issues, should have been consulted before such approval was given. Indeed, I question the legitimacy of this decision as it appears to have been passed in haste (or, should I say, when the timing was advantageous to allow the GNLP to proceed without due consultation).

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23598

Object

**Aylsham, Settlement Map****Respondent:** Geoffrey Sutton [19918]**Summary:**

The proposed development in Aylsham (apart from the fact that local people have not been consulted), is neither sound nor justified because it builds on good agricultural land. Such policy is foolishly short sighted. This country cannot feed itself as it is.

**Change suggested by respondent:**

The proposed development in Aylsham (apart from the fact that local people have not been consulted), is neither sound nor justified because it builds on good agricultural land. Such policy is foolishly short sighted. This country cannot feed itself as it is.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23263

Support

**How the GNLP fits in with other Planning bodies and strategies, 18****Respondent:** Marine Management Organisation (Georgie Sutton, Marine Planner) [19670]**Summary:**

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. The Greater Norwich Area overlaps any tidal rivers – which includes up to Norwich on the Rivers Yare and Wensum, near Ellingham on the River Waveney, and near Wroxham on the River Bure. The extent of the marine plan areas are shown on Explore Marine Plans (<https://www.gov.uk/guidance/explore-marine-plans>).

Marine plans inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the East Inshore and East Offshore Marine Plans are of relevance (<https://www.gov.uk/government/publications/east-inshore-and-east-offshore-marine-plans>).

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, in this case the East Inshore and East Offshore Marine Plans, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance (<https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-councils>), Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.

The Greater Norwich Local Plan should have regard to the East Marine Plans under section 58(3) of the Marine and Coastal Access Act 2009.

**Change suggested by respondent:**

Page 8 'How the GNLP fits in with other planning bodies and strategies: You refer to other regional plans and strategies relevant to the GNLP, and the Norfolk Strategic Planning Framework which we are in the process of signing off on. We would also recommend you mention the East Inshore and East Offshore Marine Plans here.

The Greater Norwich Local Plan should include reference to the East Marine Plans to be deemed 'sound'.

Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your 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:

EC1, EC2, EC3, SOC1, SOC2, SOC3, EC01, BIO1, BIO2, CC1, CC2, GOV1, PS1, PS2, PS3, TR3

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

## 23246

## Object

### Loddon and Chedgrave, Settlement Map

**Respondent:** Ben Tabor [20038]

**Agent:** Mr Magnus Magnusson [14502]

**Petition:** 2 petitioners

#### Summary:

Please find details in the accompanying Reg. 19 Consultation Response Statement. My client's site ought to be included in the GNLP as an allocation.

#### Change suggested by respondent:

Inclusion of site GNLP4058 within the GNLP as an allocation. Please see accompanying Reg. 19 Consultation Statement for further information.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Site Plan - <https://oc2connect.gnlp.org.uk/a/43f>  
Reg. 19 Consultation Supporting Statement. - <https://oc2connect.gnlp.org.uk/a/43g>

23247

Object

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**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Ben Tabor [20038]**Agent:** Mr Magnus Magnusson [14502]**Petition:** 2 petitioners**Summary:**

Please find details in the accompanying Reg. 19 Consultation Response Statement. My client's site ought to be included in the GNLP as an allocation.

**Change suggested by respondent:**

Inclusion of site GNLP4058 within the GNLP as an allocation. Please see accompanying Reg. 19 Consultation Statement for further information.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Site Plan - <https://oc2connect.gnlp.org.uk/a/43f>

Reg. 19 Consultation Supporting Statement. - <https://oc2connect.gnlp.org.uk/a/43g>

23470

Support

**Policy 0337R, 0337R Policy****Respondent:** Taverham Parish Council (x Taverham Councillors x, x) [17789]**Summary:**

Greater Norwich Local Plan Regulation 19 Publication - Taverham Parish Council supports the conclusions of the Stage 7 Settlement-based Appraisal of Reasonable Alternative Sites and Identification of Preferred Sites.

In particular, Taverham Parish Council agrees GNLP 0337 is the preferred option for new residential development as it is in line with Policy TAV 1 in the Taverham Neighbourhood Plan, which states that larger scale residential development should be focused in the north-east of the Plan area close to the Broadland Northway.

Taverham Parish Council agrees that GNLP 0062 is an unreasonable site as it borders the River Wensum Green Corridor and Policy TAV 8 states that this area will be protected from development that may adversely affect it. In addition, Policy TAV 10 – Protection of important public local views, identifies this area of land, and development proposals, which would adversely affect an important public view, will not be supported.

Taverham Parish Council supports the dismissal of GNLP 2051 and GNLP 2106 on highway and landscape grounds. In addition, both sites are sufficiently close to the River Wensum Green Corridor as to have an adverse impact from an environmental perspective and would be detrimental to the character and semi-rural landscape of this part of Taverham.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23632

Support

**Policy 0172, 0172 Policy****Respondent:** Taylor Wimpey [19920]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

Taylor Wimpey supports the decision to allocate land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172) for residential development, and requests that this allocation and the associated policy are retained in Draft GNLP unchanged.

In order to confirm that the decision to make the allocation at Policy GNLP0172 is robust and credible, it is suggested that some of the findings of the site assessment for this site in the HELAA and SA are corrected as set out in these representations

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23619

Support

**The Plan's Objectives, 151****Respondent:** Taylor Wimpey [19920]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

-

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23620

Support

**Delivery, Delivery Statement**

**Respondent:** Taylor Wimpey [19920]

**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]

**Summary:**

█ .

**Change suggested by respondent:**

█ -

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23622

Support

**Addressing Climate Change, Climate Change Statement**

**Respondent:** Taylor Wimpey [19920]

**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]

**Summary:**

█ .

**Change suggested by respondent:**

█ -

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None



23623

Support

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**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Taylor Wimpey [19920]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

█ .

**Change suggested by respondent:**

█ -

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23625

Support

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**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Taylor Wimpey [19920]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

█ .

**Change suggested by respondent:**

█ -

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23626

Support

Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement

Respondent: Taylor Wimpey [19920]

Agent: Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]

Summary:

█ .

Change suggested by respondent:

█ -

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Appear exam: Not specified

Attachments: None

23627

Support

Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure

Respondent: Taylor Wimpey [19920]

Agent: Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]

Summary:

█ .

Change suggested by respondent:

█ -

Legally Not specified  
compliant:

Sound: Not specified

Comply with Not specified  
duty:

Appear exam: Not specified

Attachments: None

23628

Support

**Policy 5 Homes, Policy 5 Homes****Respondent:** Taylor Wimpey [19920]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

█ .

**Change suggested by respondent:**

█ -

**Legally Not specified  
compliant:****Sound:** Not specified**Comply with Not specified  
duty:****Appear exam:** Not specified**Attachments:** None

23629

Support

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Taylor Wimpey [19920]**Agent:** Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]**Summary:**

█ .

**Change suggested by respondent:**

█ -

**Legally Not specified  
compliant:****Sound:** Not specified**Comply with Not specified  
duty:****Appear exam:** Not specified**Attachments:** None

23715

Object

**Reepham, 5.54****Respondent:** Mr Richard Taylor [19828]**Summary:**

Agree no further allocations above 'deliverable housing commitment' of 155, but:

- i) REP2 has already secured planning permission for 35 units + a 60 bed care home;
- ii) Current application PA 20200847 -141 houses on REP1 (outside settlement limits) would produce 176 units + 60 bed care home - well in excess of 'commitment' of 155 units;
- iii) 'Statement of Community Involvement' (BDC Planning portal 15.4.20), produced by PA 20200847 /REP1 developers' agents, revealed only 4% of local residents supported 'the principle of 141 houses on this site.
- iv) Environmental/infrastructure constraints (reason for no further commitments) make 155 too many.

**Change suggested by respondent:**

Fewer houses -max 100- allowed on REP 1, but a full policy percentage of 'affordables' insisted upon. A vibrant community needs a full age profile. The increased provision for seniors citizens needs to be balanced by homes for young families.

**Legally** Yes**compliant:**

Sound: No

**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23716

Object

**Reepham, 5.54****Respondent:** Mr Richard Taylor [19828]**Summary:**

If there is planning drift, and the current PA 20200847 (REP1) is allowed to build a proposed 141 houses, then the total commitment (ie including 35 units + 60 bed care home at REP2, but not including any windfall/conversions) would be 176 + 60 bed care home.

**Change suggested by respondent:**

Firm enforcement of max 135 units for overall Reepham commitment (ie Planning Inspectorate figure of 100 homes on REP1).

**Legally** Yes**compliant:**

Sound: No

**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23736

Object

**Communities, 132****Respondent:** Mr Richard Taylor [19828]**Summary:**

Many Key Service Centres have had sites allocated often, (as in the case of Reepham) against residents' wishes (only 4% supported the principle of PA 20200847/REP 1). Development on the scale suggested will reduce not improve access to services, such as primary school, GP surgery, which contradicts the justification for the strategy.

Reepham has limited employment opportunities; no railway; a slow and sporadic bus service (journey time 70 mins; nothing on Sundays; last weekday bus from Norwich to Reepham 17.15). The highway system is crumbling.

Locating so many new homes at such distance from jobs and travel infrastructure is unsound

**Change suggested by respondent:**

More use of brownfield sites, nearer the improved transport infrastructure linked to new employment opportunities.

The use of pooled CIL money has, to date, concentrated on projects about as far from Reepham as it is possible to be.

This is an implicit recognition that the KSC element of the GNDP was unsound from the beginning and needs now to be re-addressed, particularly in the light of zero carbon requirements.

**Legally** Yes**compliant:****Sound:** No**Comply with** No**duty:****Appear exam:** Written Representation**Attachments:** None

23737

Support

**Policy 5 Homes, 271****Respondent:** Mr Richard Taylor [19828]**Summary:**

When people talk about the 'housing crisis', they mean that young people are not able to get on the ladder, or not being able to access secure rented accommodation.

With this in mind, the requirement to include 33% 'affordables' on developments above a certain size is excellent and should be adhered to and not negotiated away with developers claiming that it is 'unviable'.

**Change suggested by respondent:**

-

**Legally** Not specified**compliant:****Sound:** Not specified**Comply with** Not specified**duty:****Appear exam:** Not specified**Attachments:** None

23746

Object

## Addressing Climate Change, Climate Change Statement

**Respondent:** Mr Richard Taylor [19828]

### Summary:

The stated aim of 'working towards' carbon neutral is too vague. It appears in the document almost as something introduced to tick a box, rather than fully integrated into strategic thinking.

Central to sustainability and carbon reduction are decisions about location (of both residential and employment sites), transport policy and environmental policies, as well as specifics of good design and energy use.

Far from supporting the retention of services, large scale development in some KSCs will overwhelm already stressed services and infrastructure (e.g. Reepham Primary School; Aylsham High School; Reepham GP surgery; traffic in Reepham already gridlocked at peak times).

### Change suggested by respondent:

Reduce the 22% buffer of sites in excess of 'need'. Developing less sustainable greenfield sites in this stock of sites will be 'attractive' (ie more profitable) to developers and thus increase the proportion of houses built on unsustainable sites. Return to previous thinking of GNDP, which concluded the most sustainable options would involve concentration of sites near Central Norwich & Norwich/Cambridge corridor and that the least rational strategy would be for dispersal of sites (as in example of several of the KSCs).

Specifics such as need to provide vehicle recharging infrastructure are a minimum feature of the sort of future-proofing needed.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23822

Support

## Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes

**Respondent:** The Theatres Trust (Mr Tom Clarke, Planner) [12590]

### Summary:

As set out at the previous stage of consultation, the Trust welcomes the plan's support for cultural facilities. However we consider that part of such a positive vision is to clearly state that support includes protection of valued facilities; this would be consistent with paragraph 92 of the NPPF. We would therefore urge minor revision to reflect this within part 3 of Policy 7.1.

### Change suggested by respondent:

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24265

Object

**Policy 0102, 0102 Policy****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf -  
<https://oc2connect.gnlp.org.uk/a/4ch>

24266

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf -  
<https://oc2connect.gnlp.org.uk/a/4ch>

24267

Object

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**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf -  
<https://oc2connect.gnlp.org.uk/a/4ch>



24268

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Issues and Policy 5 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 5 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
 Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
 Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4ch>

24269

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
 Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
 Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4ch>

24270

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.2 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 7.2 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
 Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
 Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf -  
<https://oc2connect.gnlp.org.uk/a/4ch>

24271

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Thelveton Estate [16357]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Change suggested by respondent:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Thelveton Estate in support of the allocation of Land west of Nelson Road, Diss.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination

**Attachments:** Land west of Nelson Road, Diss representations.pdf - <https://oc2connect.gnlp.org.uk/a/4cf>  
 Appendix 1 - Land at Nelson Road, Diss Concept Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4cg>  
 Appendix 2 - Land at Nelson Road, Diss Land Ownership Plan.pdf -  
<https://oc2connect.gnlp.org.uk/a/4ch>

23670

Object

**Aylsham, Settlement Map****Respondent:** Mrs Catherine Thomas [19867]**Summary:**

In December GNLP produced draft proposals under Reg19 with two sites for Aylsham with a total of 550 homes. There was no consultation with Aylsham Town Council or residents. Reg 18 stated that Aylsham would have one site not two sites as stated by Reg 19. Reg 19 failed to consider the impact of two sites on the infrastructure needs of the town including school, health facilities, roads and utilities. All are severely strained by the impact of the two large estates built at Bure Meadows and Willow Park. The carbon footprint will be increased further.

**Change suggested by respondent:**

Consultation with both the Town Council and residents on the new proposal for two new large residential developments. Without this the proposal is illegal.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23235

Object

**Policy 0264, 0264 Policy****Respondent:** Mr Dave Thomas [19770]**Summary:**

GNLP0264 - Horsford - this area has recently experienced severe flooding for the first time. There has been steady build up of housing, new roads, and there is a maze of ownership for the Beck to sort to keep it clear. While an investigation is pending with NCC about the cause and therefore a solution it would be unwise and unsafe for there to be any further development along Dog Lane or off Horsbeck.

**Change suggested by respondent:**

GNLP0264 - this should be removed for consideration until later in the future. There are plans for a new 5/6 unit development which will mean less ground for water to soak away on and more tarmac to speed up the floor of water into drainage which more not be suitable. Making the area as safe as possible for future flooding should be a priority.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

24242

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Thorpe and Felthorpe Trust [20054]**Agent:** Strutt & Parker (Charlotte Ellum, Technical Assistant / Secretary) [19989]**Petition:** 2 petitioners**Summary:**

Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government's objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed.

It is considered that the failure of the Plan to identify Site GNLP0442 as a specific new allocation in the Plan and to not include it as a housing allocation on the Local Plan Map or an allocation on the Thorpe St Andrew Settlement Map does not provide any certainty around the Plan's delivery strategy. Furthermore, to specifically refer to it as 'not allocated' on the Local Plan Map is extremely misleading and does not recognise its status as an existing commitment. While Policy 7.1 includes a total commitment of 386 additional dwellings with planning permission for Thorpe St Andrew which includes site GNLP0442 over the plan period 2018 – 2038 this approach is not considered clear enough for the plan to be considered sound.

See additional info in attachment

**Change suggested by respondent:**

Please see covering letter.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLP0442 Reg 19 Covering Letter.pdf - <https://oc2connect.gnlp.org.uk/a/4c3>

23695

Support

**Taverham, Settlement Map****Respondent:** Robert and Alison Tickner [19936]**Petition:** 2 petitioners**Summary:**

We fully support the decision to EXCLUDE sites GNLP 4040, 4039 and 2051 from the Local Plan, as not legally compliant and unsound and failing to comply with the duty to co-operate, for the following reasons:

1. It is outside the settlement boundary of the village. It would set a precedent for further development outside the settlement boundary, not only in Taverham, but also across the wider region.
2. The proposed development of this area around the Wensum Valley will destroy the rural amenity value, both visual and physical, currently enjoyed by a large number of people in the local community, and a wide variety of wildlife, including deer and hares.
3. Access to the site is unsuitable for vehicles in general, and especially what would be needed during the development. Macks Lane is used regularly by walkers, including children.
4. Development of this nature would substantially increase traffic on an already busy road (Taverham Road), used as a shuttle corridor beyond the local residential population, increasing road safety concerns on this residential road, particularly for the many children who walk and cycle up and down the road to and from school every day.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23954

Object

**Hingham, Settlement Maps****Respondent:** Chris Tilley [20043]**Agent:** Mr Henry Isotta [19286]**Petition:** 2 petitioners

**Summary:**

See attached Ground of Objection Statement and technical appendices as contained in separate uploaded documents.

Grounds of Objections document  
 Appendix A – Flood Risk Issues  
 Appendix B – Clayland Revised Objective HELAA Suitability Assessment document  
 Appendix C – C1 Highways Report  
 C2 Pedestrian Routes review  
 Appendix D – Landscape, Townscape and Heritage Issues  
 Appendix E – Compatibility with Adjoining Uses  
 Appendix F – F1 Indicative site layout for 0298/0335/4007,  
 F2 Biodiversity community benefits,  
 F3 Housing mix policy issues  
 F4 Proximity to SSSI's  
 Appendix G – Weight given to Community and Local Representation issues  
 Appendix H – Clayland Proposed Modification to the Allocations  
 Appendix I – Clayland Draft Statement of Common Ground with GNLP  
 Appendix J – Clayland Statement of Common Ground with Hingham Town Council

**Change suggested by respondent:**

Please see attached Grounds of Objection document and in particular the Proposed Modification within Appendix H

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Ground of Objection - <https://oc2connect.gnlp.org.uk/a/47g>  
 Appendix A – Flood Risk Issues - <https://oc2connect.gnlp.org.uk/a/47h>  
 Appendix B – Clayland Revised Objective HELAA Suitability Assessment document -  
<https://oc2connect.gnlp.org.uk/a/47x>  
 Appendix C – C1 Highways Report - <https://oc2connect.gnlp.org.uk/a/47j>  
 C2 Pedestrian Routes review - <https://oc2connect.gnlp.org.uk/a/47k>  
 Appendix D – Landscape, Townscape and Heritage Issues - <https://oc2connect.gnlp.org.uk/a/47z>  
 Appendix E – Compatibility with Adjoining Uses - <https://oc2connect.gnlp.org.uk/a/47m>  
 Appendix F – F1 Indicative site layout for 0298/0335/4007, - <https://oc2connect.gnlp.org.uk/a/47n>  
 F2 Biodiversity community benefits, - <https://oc2connect.gnlp.org.uk/a/47y>  
 F3 Housing mix policy issues - <https://oc2connect.gnlp.org.uk/a/47p>  
 Appendix G – Weight given to Community and Local Representation issues -  
<https://oc2connect.gnlp.org.uk/a/47q>  
 Appendix H – Clayland Proposed Modification to the Allocations -  
<https://oc2connect.gnlp.org.uk/a/48r>  
 Appendix I – Clayland Draft Statement of Common Ground with GNLP -  
<https://oc2connect.gnlp.org.uk/a/48s>  
 Appendix J – Clayland Statement of Common Ground with Hingham Town Council -  
<https://oc2connect.gnlp.org.uk/a/48t>  
 Appendix F4 - Proximity of sites to SSSIs - <https://oc2connect.gnlp.org.uk/a/4wn>

23774

Object

**Foulsham and Themelthorpe, 6.35****Respondent:** Miss Rebecca Tilley [19946]**Summary:**

Regarding the schools capacity and there being room for expansion, I believe this to be false due to the positioning of the site near residential properties as there is a lack of land surrounding it for expansion. There is only a small pub and shop in the village with no other amenities, so lack of employment opportunities. Furthermore The position of the site having to have access through an already crowded estate as it is a bottle neck with parked cars already, this would be a nightmare for existing residents.

**Change suggested by respondent:**

No future development should be carried forward simple due to the lack of amenities. The position of the site, the lack of employment in the village and the Unrealistic view to expand the school.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23342

Object

**Transport, 240****Respondent:** Dr Matthew Tomlinson [17696]**Summary:**

The inclusion of this proposed road is incompatible with Norfolk county councils climate change statement and its inclusion in the GNLP is therefore unsound. Put simply building more roads encourages more car use and raises carbon emissions from transport. The large funds allocated to the project are far better used for improving cycle lanes and public transport, which would greatly help meet future carbon emission targets.

Norfolk county council Council is also supporting development of a Norfolk and Suffolk 25-year Environment Plan to protect, conserve and enhance the region's environment. the proposed link road goes directly against this (and is therefore unsound) as it will destroy highly valuable mature habitat, which will take decades to replace and even then it will not be possible to restore the habitat and its biodiversity there at the moment. The proposed link roads environmental mitigation measures do little for the national important wildlife there and instead focus on its amenity value.

**Change suggested by respondent:**

I believe the link road itself is unsound and the western link road project needs to be stopped. There are much better alternatives to this damaging proposal.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

23291

Object

**Economy, 127****Respondent:** Mr Robert Towns [19798]**Summary:**

There has been no consultation on the proposed additional housing in Aylsham. You have elected to build two housing estates which will "bookend" my property. This will ruin our countryside views and spoil the local area. Aylsham is a small town with very little infrastructure to cope with this additional housing.

**Change suggested by respondent:**

Reduce the amount of proposed housing. We have already had two housing estates. Why do we need two more?

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23292

Object

**Communities, 132****Respondent:** Mr Robert Towns [19798]**Summary:**

Please explain to me how "people of all ages will have access to good facilities"? Aylsham is a small town with few facilities as is. How will adding another 550 homes improve this. There are no new doctors, supermarkets or high schools being added. The roads are small and inadequate, adding another 550 homes will not help this situation.

**Change suggested by respondent:**

Reduce the amount of proposed homes. Force the developers to improve infrastructure and facilities. We do not need another proposed care home

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None



23287

Support

**Poringland, 5.50****Respondent:** Mr Chris Troise [15351]**Summary:**

I support no new applications being proposed in this key service centre which has experienced extensive development in recent years.

There are already sufficient planning permissions in place on sites within the key service centre.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24429

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]**Summary:**

It is considered that Policy 5, and the handling of elderly accommodation has not been positively prepared, is unjustified, ineffective, and inconsistent with national policy due to the failure to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need.

Paragraph 275 of the Strategy states "an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist County's aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing." There is an ever expanding need for older persons' accommodation. In fact, we applaud the efforts of the Greater Norwich Local Plan in trying to reduce the reliance in the traditional sense of residential care homes. Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to such institutions which are often unfamiliar surroundings which exacerbate deteriorating health conditions.

Paragraph 276 of the Strategy states that "the policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council strategy identifies the need for 2842 additional extra care units by 2028. County wide evidence has identified the need for 3857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038." Both of these figures differ from the stated 3,909 spaces within C2 institutions that the SHMA is expecting to be used. Given the discrepancy in the evidence base, it appears that these statistics are not based off of a robust up-to-date evidence base as required by paragraph 35 of the NPPF and as such, do not constitute a justified or sound approach.

Paragraph 277 of the Strategy states "to help provide for this need, the plan contains a specific allocation for a specialised development for active ageing at Colney Hall on site allocations with an element of specialist housing in the

policy (Taverham, Aylsham, Harleston and Barrack Street, Norwich). In addition, policy 5 supports the delivery of older peoples and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. Development Management officers will ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up to date evidence of need." As paragraph 276 states that there is a need for 3857 specialist units, as paragraph 277 states, this will be addressed through the provision of four dedicated sites with the shortfall being taken up in allocated residential sites.

Taking the above allocations into consideration, they would cumulatively result in the provision of approximately 300 dedicated elderly accommodation units. This is not a sound or appropriate strategy, nor is it positively prepared as the proposed allocations do not meet the areas need, nor does it meet even 25% of the area's identified need. As such, it is considered this approach is not sound in accordance with paragraph 35 of the NPPF.

As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This view is also echoed in paragraph 61 of the NPPF. Schemes that propose elderly care within larger residential allocations typically provide designated cul-de-sacs or clusters of specialist accommodation that does not help in providing or reinforcing community cohesion. Instead, such schemes promote isolation from the wider locality, as these elements within large residential sites are often inwardly focused with either secluded elements of public open space or a lack of connection to wider provision on site. This undermines the aspirations of delivering a healthy and cohesive community in conflict with the aims of the NPPF ultimately resulting in an unsound strategy in conflict with paragraph 35 of the NPPF.

Overall, the plan fails to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need and as such has not been positively prepared, is unjustified, ineffective, and is inconsistent with national policy.

**Change suggested by respondent:**

Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to C2 institutions which often result in unfamiliar surroundings which can exacerbate deteriorating health conditions. As such, the allocation of more 'Care Village' sites, where residents can age gracefully in the relative comfort of their own homes, whilst having independence, as well as medical and social care on site for when they need it, is a better strategy to address the needs of the aging population in the GNLP area. Additionally, through the allocation of specific additional sites, the significant identified need can be better addressed.

For example, one such site of the many needed is the Racecourse Community Park. this site promotes the concept of creating a care village which residents can move into before the critical stage of later life begins whilst they have full cognitive functions. This would foster community cohesion as well aid in stimulating community activities. There would be great benefit in allocating site GNLP0177-B at the Racecourse Community Park for specialist older persons accommodation and care provision to address the identified need. Through the allocation of Site GNLP0177-B , the Plan would not only better address the identified need for elderly accommodation, but provide a better alternative to C2 institutions and be in keeping with the aims and objectives of the GNLP and wider national strategies and ambitions.

As stated with the various evidence bases, there is a predicted short fall of over 3500 specialist units, if these were not to be provided across the residential allocations within the Greater Norwich Local Plan area. Incorporating so many of these in housing allocations has negative repercussions for future residents. Humans by nature thrive in communities, places where social interaction amongst like-minded and similar aged individuals helps retain and improve cognitive functions. The Racecourse Community Park provides the setting, and aspiration to deliver not only purpose-built homes in a community, but homes that would foster and encourage interactions amongst elderly occupiers and residents, whilst also being able to cater for a large dedicated variety of elderly care needs. Additionally, given the rise in suicide rates for elderly individuals due to depression and isolation it is viewed that providing more specialist accommodation clusters, such as this site in a setting which encourages outdoor social interaction could accommodate and help provide a better quality of life. This would also negate the inevitable token 3 or 4 units that will be sandwiched within large residential allocations in order to be policy compliant. As such, it is viewed that dedicated allocations of designated elderly accommodation is preferable not only for future occupiers, but also for developers aiding viability and ensuring deliverability of the residential allocations.

Policy 5 of the Greater Norwich Local Plan relates to the provision of housing. The policy encompasses all elements of housing including affordable housing, space standards, accessible and specialist housing, gypsy and traveler accommodation, purpose-built student accommodation, and self or custom build housing. Regarding the need for the provision of elderly accommodation, Policy 5 supports the incorporation of specialist accommodation within residential proposals. The Racecourse Community Park would include a significant element of specialist accommodation for the elderly and employment generating uses. The site therefore not only ties in with a wider strategic vision for the greater Norwich area but also adheres to the requirements of policy 5. It is noted that policy 5 will support specialist elderly accommodation where there is good access to local services. As part of the overall proposals for this site it is envisaged that a range of services will be provided that not only cover amenity, encouraging a healthy lifestyle, but also basic services to supplement those offered within both Hethersett and Cringleford. This is reinforced by the proposed Highways England improvement works to the A47/ A11 Thickthorn Junction Improvement scheme and the Parkland Management Plan for the Racecourse Community Park which has identified the need for minor allocations (for employment generating uses in close proximity to the Thickthorn Park & Ride extension and new link road) in support of the long-term ambitions and management strategy for the site.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Strategic Gap Review - <https://oc2connect.gnlp.org.uk/a/4fm>

Parkland Management Plan - <https://oc2connect.gnlp.org.uk/a/4fn>

Landscape Strategy - <https://oc2connect.gnlp.org.uk/a/4fy>

Aylesbury Vale Process Note Housing for Older People - <https://oc2connect.gnlp.org.uk/a/4fp>

24443

Object

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**Policy 5 Homes, Policy 5 Homes**

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

It is considered that Policy 5, and the handling of elderly accommodation has not been positively prepared, is unjustified, ineffective, and inconsistent with national policy due to the failure to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need.

Paragraph 275 of the Strategy states “an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist County’s aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing.” There is an ever expanding need for older persons’ accommodation. In fact, we applaud the efforts of the Greater Norwich Local Plan in trying to reduce the reliance in the traditional sense of residential care homes. Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to such institutions which are often unfamiliar surroundings which exacerbate deteriorating health conditions.

Paragraph 276 of the Strategy states that “the policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council strategy identifies the need for 2842 additional extra care units by 2028. County wide evidence has identified the need for 3857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038.” Both of these figures differ from the stated 3,909 spaces within C2 institutions that the SHMA is expecting to be used. Given the discrepancy in the evidence base, it appears that these statistics are not based off of a robust up-to-date evidence base as required by paragraph 35 of the NPPF and as such, do not constitute a justified or sound approach.

Paragraph 277 of the Strategy states “to help provide for this need, the plan contains a specific allocation for a specialised development for active ageing at Colney Hall on site allocations with an element of specialist housing in the policy (Taverham, Aylsham, Harleston and Barrack Street, Norwich). In addition, policy 5 supports the delivery of older peoples and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. Development Management officers will ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up to date evidence of need.” As paragraph 276 states that there is a need for 3857 specialist units, as paragraph 277 states, this will be addressed through the provision of four dedicated sites with the shortfall being taken up in allocated residential sites.

Taking the above allocations into consideration, they would cumulatively result in the provision of approximately 300 dedicated elderly accommodation units. This is not a sound or appropriate strategy, nor is it positively prepared as the proposed allocations do not meet the areas need, nor does it meet even 25% of the area’s identified need. As such, it is considered this approach is not sound in accordance with paragraph 35 of the NPPF.

As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This view is also echoed in paragraph 61 of the NPPF. Schemes that propose elderly care within larger residential allocations typically provide designated cul-de-sacs or clusters of specialist accommodation that does not help in providing or reinforcing community cohesion. Instead, such schemes promote isolation from the wider locality, as these elements within large residential sites are often inwardly focused with either secluded elements of public open space or a lack of connection to wider provision on site. This undermines the aspirations of delivering a healthy and cohesive community in conflict with the aims of the NPPF ultimately resulting in an unsound strategy in conflict with paragraph 35 of the NPPF.

Overall the plan fails to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need and as such has not been positively prepared, is unjustified, ineffective and is inconsistent with national policy.

**Change suggested by respondent:**

Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to C2 institutions which often result in unfamiliar surroundings which can exacerbate deteriorating health conditions. As such, the allocation of more 'Care Village' sites, where residents can age gracefully in the relative comfort of their own homes, whilst having independence, as well as medical and social care on site for when they need it, is a better strategy to address the needs of the aging population in the GNLP area. Additionally, through the allocation of specific additional sites, the significant identified need can be better addressed.

For example, one such site of the many needed is the Racecourse Community Park. This site promotes the concept of creating a care village which residents can move into before the critical stage of later life begins whilst they have full cognitive functions. This would foster community cohesion as well as aid in stimulating community activities. There would be great benefit in allocating site GNLP0177-B at the Racecourse Community Park for specialist older persons accommodation and care provision to address the identified need. Through the allocation of Site GNLP0177-B, the Plan would not only better address the identified need for elderly accommodation, but provide a better alternative to C2 institutions and be in keeping with the aims and objectives of the GNLP and wider national strategies and ambitions.

As stated with the various evidence bases, there is a predicted shortfall of over 3500 specialist units, if these were not to be provided across the residential allocations within the Greater Norwich Local Plan area. Incorporating so many of these in housing allocations has negative repercussions for future residents. Humans by nature thrive in communities, places where social interaction amongst like-minded and similar aged individuals helps retain and improve cognitive functions. The Racecourse Community Park provides the setting, and aspiration to deliver not only purpose-built homes in a community, but homes that would foster and encourage interactions amongst elderly occupiers and residents, whilst also being able to cater for a large dedicated variety of elderly care needs. Additionally, given the rise in suicide rates for elderly individuals due to depression and isolation it is viewed that providing more specialist accommodation clusters, such as this site in a setting which encourages outdoor social interaction could accommodate and help provide a better quality of life. This would also negate the inevitable token 3 or 4 units that will be sandwiched within large residential allocations in order to be policy compliant. As such, it is viewed that dedicated allocations of designated elderly accommodation is preferable not only for future occupiers, but also for developers aiding viability and ensuring deliverability of the residential allocations.

Policy 5 of the Greater Norwich Local Plan relates to the provision of housing. The policy encompasses all elements of housing including affordable housing, space standards, accessible and specialist housing, gypsy and traveler accommodation, purpose-built student accommodation, and self or custom build housing. Regarding the need for the provision of elderly accommodation, Policy 5 supports the incorporation of specialist accommodation within residential proposals. The Racecourse Community Park would include a significant element of specialist accommodation for the elderly and employment generating uses. The site therefore not only ties in with a wider strategic vision for the greater Norwich area but also adheres to the requirements of policy 5. It is noted that policy 5 will support specialist elderly accommodation where there is good access to local services. As part of the overall proposals for this site it is envisaged that a range of services will be provided that not only cover amenity, encouraging a healthy lifestyle, but also basic services to supplement those offered within both Hethersett and Cringleford. This is reinforced by the proposed Highways England improvement works to the A47/ A11 Thickthorn Junction Improvement scheme and the Parkland Management Plan for the Racecourse Community Park which has identified the need for minor allocations (for employment generating uses in close proximity to the Thickthorn Park & Ride extension and new link road) in support of the long-term ambitions and management strategy for the site.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>

Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24444

Object

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**Policy 5 Homes, 275**

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

It is considered that Policy 5, and the handling of elderly accommodation has not been positively prepared, is unjustified, ineffective, and inconsistent with national policy due to the failure to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need.

Paragraph 275 of the Strategy states “an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist County’s aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing.” There is an ever expanding need for older persons’ accommodation. In fact, we applaud the efforts of the Greater Norwich Local Plan in trying to reduce the reliance in the traditional sense of residential care homes. Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to such institutions which are often unfamiliar surroundings which exacerbate deteriorating health conditions.

Paragraph 276 of the Strategy states that “the policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council strategy identifies the need for 2842 additional extra care units by 2028. County wide evidence has identified the need for 3857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038.” Both of these figures differ from the stated 3,909 spaces within C2 institutions that the SHMA is expecting to be used. Given the discrepancy in the evidence base, it appears that these statistics are not based off of a robust up-to-date evidence base as required by paragraph 35 of the NPPF and as such, do not constitute a justified or sound approach.

Paragraph 277 of the Strategy states “to help provide for this need, the plan contains a specific allocation for a specialised development for active ageing at Colney Hall on site allocations with an element of specialist housing in the policy (Taverham, Aylsham, Harleston and Barrack Street, Norwich). In addition, policy 5 supports the delivery of older peoples and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. Development Management officers will ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up to date evidence of need.” As paragraph 276 states that there is a need for 3857 specialist units, as paragraph 277 states, this will be addressed through the provision of four dedicated sites with the shortfall being taken up in allocated residential sites.

Taking the above allocations into consideration, they would cumulatively result in the provision of approximately 300 dedicated elderly accommodation units. This is not a sound or appropriate strategy, nor is it positively prepared as the proposed allocations do not meet the areas need, nor does it meet even 25% of the area’s identified need. As such, it is considered this approach is not sound in accordance with paragraph 35 of the NPPF.

As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This view is also echoed in paragraph 61 of the NPPF. Schemes that propose elderly care within larger residential allocations typically provide designated cul-de-sacs or clusters of specialist accommodation that does not help in providing or reinforcing community cohesion. Instead, such schemes promote isolation from the wider locality, as these elements within large residential sites are often inwardly focused with either secluded elements of public open space or a lack of connection to wider provision on site. This undermines the aspirations of delivering a healthy and cohesive community in conflict with the aims of the NPPF ultimately resulting in an unsound strategy in conflict with paragraph 35 of the NPPF.

Overall, the plan fails to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need and as such has not been positively prepared, is unjustified, ineffective, and is inconsistent with national policy.



**Change suggested by respondent:**

Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to C2 institutions which often result in unfamiliar surroundings which can exacerbate deteriorating health conditions. As such, the allocation of more 'Care Village' sites, where residents can age gracefully in the relative comfort of their own homes, whilst having independence, as well as medical and social care on site for when they need it, is a better strategy to address the needs of the aging population in the GNLP area. Additionally, through the allocation of specific additional sites, the significant identified need can be better addressed.

For example, one such site of the many needed is the Racecourse Community Park. This site promotes the concept of creating a care village which residents can move into before the critical stage of later life begins whilst they have full cognitive functions. This would foster community cohesion as well as aid in stimulating community activities. There would be great benefit in allocating site GNLP0177-B at the Racecourse Community Park for specialist older persons accommodation and care provision to address the identified need. Through the allocation of Site GNLP0177-B, the Plan would not only better address the identified need for elderly accommodation, but provide a better alternative to C2 institutions and be in keeping with the aims and objectives of the GNLP and wider national strategies and ambitions.

As stated with the various evidence bases, there is a predicted shortfall of over 3500 specialist units, if these were not to be provided across the residential allocations within the Greater Norwich Local Plan area. Incorporating so many of these in housing allocations has negative repercussions for future residents. Humans by nature thrive in communities, places where social interaction amongst like-minded and similar aged individuals helps retain and improve cognitive functions. The Racecourse Community Park provides the setting, and aspiration to deliver not only purpose-built homes in a community, but homes that would foster and encourage interactions amongst elderly occupiers and residents, whilst also being able to cater for a large dedicated variety of elderly care needs. Additionally, given the rise in suicide rates for elderly individuals due to depression and isolation it is viewed that providing more specialist accommodation clusters, such as this site in a setting which encourages outdoor social interaction could accommodate and help provide a better quality of life. This would also negate the inevitable token 3 or 4 units that will be sandwiched within large residential allocations in order to be policy compliant. As such, it is viewed that dedicated allocations of designated elderly accommodation is preferable not only for future occupiers, but also for developers aiding viability and ensuring deliverability of the residential allocations.

Policy 5 of the Greater Norwich Local Plan relates to the provision of housing. The policy encompasses all elements of housing including affordable housing, space standards, accessible and specialist housing, gypsy and traveler accommodation, purpose-built student accommodation, and self or custom build housing. Regarding the need for the provision of elderly accommodation, Policy 5 supports the incorporation of specialist accommodation within residential proposals. The Racecourse Community Park would include a significant element of specialist accommodation for the elderly and employment generating uses. The site therefore not only ties in with a wider strategic vision for the greater Norwich area but also adheres to the requirements of policy 5. It is noted that policy 5 will support specialist elderly accommodation where there is good access to local services. As part of the overall proposals for this site it is envisaged that a range of services will be provided that not only cover amenity, encouraging a healthy lifestyle, but also basic services to supplement those offered within both Hethersett and Cringleford. This is reinforced by the proposed Highways England improvement works to the A47/ A11 Thickthorn Junction Improvement scheme and the Parkland Management Plan for the Racecourse Community Park which has identified the need for minor allocations (for employment generating uses in close proximity to the Thickthorn Park & Ride extension and new link road) in support of the long-term ambitions and management strategy for the site.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>

Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24445

Object

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**Policy 5 Homes, 276**

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

It is considered that Policy 5, and the handling of elderly accommodation has not been positively prepared, is unjustified, ineffective, and inconsistent with national policy due to the failure to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need.

Paragraph 275 of the Strategy states “an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist County’s aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing.” There is an ever expanding need for older persons’ accommodation. In fact, we applaud the efforts of the Greater Norwich Local Plan in trying to reduce the reliance in the traditional sense of residential care homes. Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to such institutions which are often unfamiliar surroundings which exacerbate deteriorating health conditions.

Paragraph 276 of the Strategy states that “the policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council strategy identifies the need for 2842 additional extra care units by 2028. County wide evidence has identified the need for 3857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038.” Both of these figures differ from the stated 3,909 spaces within C2 institutions that the SHMA is expecting to be used. Given the discrepancy in the evidence base, it appears that these statistics are not based off of a robust up-to-date evidence base as required by paragraph 35 of the NPPF and as such, do not constitute a justified or sound approach.

Paragraph 277 of the Strategy states “to help provide for this need, the plan contains a specific allocation for a specialised development for active ageing at Colney Hall on site allocations with an element of specialist housing in the policy (Taverham, Aylsham, Harleston and Barrack Street, Norwich). In addition, policy 5 supports the delivery of older peoples and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. Development Management officers will ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up to date evidence of need.” As paragraph 276 states that there is a need for 3857 specialist units, as paragraph 277 states, this will be addressed through the provision of four dedicated sites with the shortfall being taken up in allocated residential sites.

Taking the above allocations into consideration, they would cumulatively result in the provision of approximately 300 dedicated elderly accommodation units. This is not a sound or appropriate strategy, nor is it positively prepared as the proposed allocations do not meet the areas need, nor does it meet even 25% of the area’s identified need. As such, it is considered this approach is not sound in accordance with paragraph 35 of the NPPF.

As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This view is also echoed in paragraph 61 of the NPPF. Schemes that propose elderly care within larger residential allocations typically provide designated cul-de-sacs or clusters of specialist accommodation that does not help in providing or reinforcing community cohesion. Instead, such schemes promote isolation from the wider locality, as these elements within large residential sites are often inwardly focused with either secluded elements of public open space or a lack of connection to wider provision on site. This undermines the aspirations of delivering a healthy and cohesive community in conflict with the aims of the NPPF ultimately resulting in an unsound strategy in conflict with paragraph 35 of the NPPF.

Overall, the plan fails to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need and as such has not been positively prepared, is unjustified, ineffective, and is inconsistent with national policy.

**Change suggested by respondent:**

Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to C2 institutions which often result in unfamiliar surroundings which can exacerbate deteriorating health conditions. As such, the allocation of more 'Care Village' sites, where residents can age gracefully in the relative comfort of their own homes, whilst having independence, as well as medical and social care on site for when they need it, is a better strategy to address the needs of the aging population in the GNLP area. Additionally, through the allocation of specific additional sites, the significant identified need can be better addressed.

For example, one such site of the many needed is the Racecourse Community Park. this site promotes the concept of creating a care village which residents can move into before the critical stage of later life begins whilst they have full cognitive functions. This would foster community cohesion as well aid in stimulating community activities. There would be great benefit in allocating site GNLP0177-B at the Racecourse Community Park for specialist older persons accommodation and care provision to address the identified need. Through the allocation of Site GNLP0177-B , the Plan would not only better address the identified need for elderly accommodation, but provide a better alternative to C2 institutions and be in keeping with the aims and objectives of the GNLP and wider national strategies and ambitions.

As stated with the various evidence bases, there is a predicted short fall of over 3500 specialist units, if these were not to be provided across the residential allocations within the Greater Norwich Local Plan area. Incorporating so many of these in housing allocations has negative repercussions for future residents. Humans by nature thrive in communities, places where social interaction amongst like-minded and similar aged individuals helps retain and improve cognitive functions. The Racecourse Community Park provides the setting, and aspiration to deliver not only purpose-built homes in a community, but homes that would foster and encourage interactions amongst elderly occupiers and residents, whilst also being able to cater for a large dedicated variety of elderly care needs. Additionally, given the rise in suicide rates for elderly individuals due to depression and isolation it is viewed that providing more specialist accommodation clusters, such as this site in a setting which encourages outdoor social interaction could accommodate and help provide a better quality of life. This would also negate the inevitable token 3 or 4 units that will be sandwiched within large residential allocations in order to be policy compliant. As such, it is viewed that dedicated allocations of designated elderly accommodation is preferable not only for future occupiers, but also for developers aiding viability and ensuring deliverability of the residential allocations.

Policy 5 of the Greater Norwich Local Plan relates to the provision of housing. The policy encompasses all elements of housing including affordable housing, space standards, accessible and specialist housing, gypsy and traveler accommodation, purpose-built student accommodation, and self or custom build housing. Regarding the need for the provision of elderly accommodation, Policy 5 supports the incorporation of specialist accommodation within residential proposals. The Racecourse Community Park would include a significant element of specialist accommodation for the elderly and employment generating uses. The site therefore not only ties in with a wider strategic vision for the greater Norwich area but also adheres to the requirements of policy 5. It is noted that policy 5 will support specialist elderly accommodation where there is good access to local services. As part of the overall proposals for this site it is envisaged that a range of services will be provided that not only cover amenity, encouraging a healthy lifestyle, but also basic services to supplement those offered within both Hethersett and Cringleford. This is reinforced by the proposed Highways England improvement works to the A47/ A11 Thickthorn Junction Improvement scheme and the Parkland Management Plan for the Racecourse Community Park which has identified the need for minor allocations (for employment generating uses in close proximity to the Thickthorn Park & Ride extension and new link road) in support of the long-term ambitions and management strategy for the site.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>

Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24446

Object

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**Policy 5 Homes, 277**

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

It is considered that Policy 5, and the handling of elderly accommodation has not been positively prepared, is unjustified, ineffective, and inconsistent with national policy due to the failure to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need.

Paragraph 275 of the Strategy states “an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist County’s aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing.” There is an ever expanding need for older persons’ accommodation. In fact, we applaud the efforts of the Greater Norwich Local Plan in trying to reduce the reliance in the traditional sense of residential care homes. Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to such institutions which are often unfamiliar surroundings which exacerbate deteriorating health conditions.

Paragraph 276 of the Strategy states that “the policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council strategy identifies the need for 2842 additional extra care units by 2028. County wide evidence has identified the need for 3857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038.” Both of these figures differ from the stated 3,909 spaces within C2 institutions that the SHMA is expecting to be used. Given the discrepancy in the evidence base, it appears that these statistics are not based off of a robust up-to-date evidence base as required by paragraph 35 of the NPPF and as such, do not constitute a justified or sound approach.

Paragraph 277 of the Strategy states “to help provide for this need, the plan contains a specific allocation for a specialised development for active ageing at Colney Hall on site allocations with an element of specialist housing in the policy (Taverham, Aylsham, Harleston and Barrack Street, Norwich). In addition, policy 5 supports the delivery of older peoples and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. Development Management officers will ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up to date evidence of need.” As paragraph 276 states that there is a need for 3857 specialist units, as paragraph 277 states, this will be addressed through the provision of four dedicated sites with the shortfall being taken up in allocated residential sites.

Taking the above allocations into consideration, they would cumulatively result in the provision of approximately 300 dedicated elderly accommodation units. This is not a sound or appropriate strategy, nor is it positively prepared as the proposed allocations do not meet the areas need, nor does it meet even 25% of the area’s identified need. As such, it is considered this approach is not sound in accordance with paragraph 35 of the NPPF.

As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This view is also echoed in paragraph 61 of the NPPF. Schemes that propose elderly care within larger residential allocations typically provide designated cul-de-sacs or clusters of specialist accommodation that does not help in providing or reinforcing community cohesion. Instead, such schemes promote isolation from the wider locality, as these elements within large residential sites are often inwardly focused with either secluded elements of public open space or a lack of connection to wider provision on site. This undermines the aspirations of delivering a healthy and cohesive community in conflict with the aims of the NPPF ultimately resulting in an unsound strategy in conflict with paragraph 35 of the NPPF.

Overall, the plan fails to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need and as such has not been positively prepared, is unjustified, ineffective, and is inconsistent with national policy.

**Change suggested by respondent:**

Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to C2 institutions which often result in unfamiliar surroundings which can exacerbate deteriorating health conditions. As such, the allocation of more 'Care Village' sites, where residents can age gracefully in the relative comfort of their own homes, whilst having independence, as well as medical and social care on site for when they need it, is a better strategy to address the needs of the aging population in the GNLP area. Additionally, through the allocation of specific additional sites, the significant identified need can be better addressed.

For example, one such site of the many needed is the Racecourse Community Park. this site promotes the concept of creating a care village which residents can move into before the critical stage of later life begins whilst they have full cognitive functions. This would foster community cohesion as well aid in stimulating community activities. There would be great benefit in allocating site GNLP0177-B at the Racecourse Community Park for specialist older persons accommodation and care provision to address the identified need. Through the allocation of Site GNLP0177-B , the Plan would not only better address the identified need for elderly accommodation, but provide a better alternative to C2 institutions and be in keeping with the aims and objectives of the GNLP and wider national strategies and ambitions.

As stated with the various evidence bases, there is a predicted short fall of over 3500 specialist units, if these were not to be provided across the residential allocations within the Greater Norwich Local Plan area. Incorporating so many of these in housing allocations has negative repercussions for future residents. Humans by nature thrive in communities, places where social interaction amongst like-minded and similar aged individuals helps retain and improve cognitive functions. The Racecourse Community Park provides the setting, and aspiration to deliver not only purpose-built homes in a community, but homes that would foster and encourage interactions amongst elderly occupiers and residents, whilst also being able to cater for a large dedicated variety of elderly care needs. Additionally, given the rise in suicide rates for elderly individuals due to depression and isolation it is viewed that providing more specialist accommodation clusters, such as this site in a setting which encourages outdoor social interaction could accommodate and help provide a better quality of life. This would also negate the inevitable token 3 or 4 units that will be sandwiched within large residential allocations in order to be policy compliant. As such, it is viewed that dedicated allocations of designated elderly accommodation is preferable not only for future occupiers, but also for developers aiding viability and ensuring deliverability of the residential allocations.

Policy 5 of the Greater Norwich Local Plan relates to the provision of housing. The policy encompasses all elements of housing including affordable housing, space standards, accessible and specialist housing, gypsy and traveler accommodation, purpose-built student accommodation, and self or custom build housing. Regarding the need for the provision of elderly accommodation, Policy 5 supports the incorporation of specialist accommodation within residential proposals. The Racecourse Community Park would include a significant element of specialist accommodation for the elderly and employment generating uses. The site therefore not only ties in with a wider strategic vision for the greater Norwich area but also adheres to the requirements of policy 5. It is noted that policy 5 will support specialist elderly accommodation where there is good access to local services. As part of the overall proposals for this site it is envisaged that a range of services will be provided that not only cover amenity, encouraging a healthy lifestyle, but also basic services to supplement those offered within both Hethersett and Cringleford. This is reinforced by the proposed Highways England improvement works to the A47/ A11 Thickthorn Junction Improvement scheme and the Parkland Management Plan for the Racecourse Community Park which has identified the need for minor allocations (for employment generating uses in close proximity to the Thickthorn Park & Ride extension and new link road) in support of the long-term ambitions and management strategy for the site.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>

Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
 ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
 20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24432

Object

## Site Assessment Booklets and Studies, Sustainability Appraisal Report

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Regarding the GNLPs response to point 6: 6 Increased risk of urbanisation of the open countryside and coalescence. A total of 84 allocated sites are located on previously developed land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.

It is important to undertake a new review of the strategic gaps and other areas between settlements at risk of coalescence to provide an up-to-date evidence base to inform new allocations. As such, with a lack of a review regarding the Strategic Gap, especially in light of the new strategic infrastructure works, it is considered that the GNLP is not justified regarding an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence and therefore conflicting with paragraph 35 of the NPPF.

### Change suggested by respondent:

It is considered that a review into strategic gaps and coalescence should be undertaken. An initial assessment has been completed for the Hethersett- Cringleford strategic gap. A copy is enclosed with this representation. From this we can see that development can be accommodated safely within the identified areas without impacting upon or resulting in coalescence between the two settlements. This would open up highly sustainable land, with a wealth of public benefits and opportunities. As a consequence of this, it is considered that the allocation of small sites within the originally proposed area identified as Hethersett GNLP0177-BR would be sustainable. This has been further evidenced through the procurement of a Parkland Management Plan for the site that would result in a strong preservation and enhancement of not only the historic assets but also the natural assets of the site whilst introducing new community and social infrastructure and opportunities for outdoor leisure and recreation through the creation of permission footpaths and access to the Parkland.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Strategic Gap Review - <https://oc2connect.gnlp.org.uk/a/4fm>

Parkland Management Plan - <https://oc2connect.gnlp.org.uk/a/4fn>

Landscape Strategy - <https://oc2connect.gnlp.org.uk/a/4fy>

Aylesbury Vale Process Note Housing for Older People - <https://oc2connect.gnlp.org.uk/a/4fp>



24433

Object

## Site Assessment Booklets and Studies, Appendix B – Tables of Unallocated Sites with reasons for rejection

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Re: Broadland and South Norfolk Non-residential Sites, specifically GNLP0177-BR

Regarding the GNLPs response to point 6: 6 Increased risk of urbanisation of the open countryside and coalescence. A total of 84 allocated sites are located on previously developed land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.

It is important to undertake a new review of the strategic gaps and other areas between settlements at risk of coalescence to provide an up-to-date evidence base to inform new allocations. As such, with a lack of a review regarding the Strategic Gap, especially in light of the new strategic infrastructure works, it is considered that the GNLP is not justified regarding an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence and therefore conflicting with paragraph 35 of the NPPF.

### Change suggested by respondent:

It is considered that a review into strategic gaps and coalescence should be undertaken. An initial assessment has been completed for the Hethersett- Cringleford strategic gap. A copy is enclosed with this representation. From this we can see that development can be accommodated safely within the identified areas without impacting upon or resulting in coalescence between the two settlements. This would open up highly sustainable land, with a wealth of public benefits and opportunities. As a consequence of this, it is considered that the allocation of small sites within the originally proposed area identified as Hethersett GNLP0177-BR would be sustainable. This has been further evidenced through the procurement of a Parkland Management Plan for the site that would result in a strong preservation and enhancement of not only the historic assets but also the natural assets of the site whilst introducing new community and social infrastructure and opportunities for outdoor leisure and recreation through the creation of permission footpaths and access to the Parkland.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Strategic Gap Review - <https://oc2connect.gnlp.org.uk/a/4fm>

Parkland Management Plan - <https://oc2connect.gnlp.org.uk/a/4fn>

Landscape Strategy - <https://oc2connect.gnlp.org.uk/a/4fy>

Aylesbury Vale Process Note Housing for Older People - <https://oc2connect.gnlp.org.uk/a/4fp>

24428

Object

## Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

Policy 3 is a standard policy that is adopted by most LPA's regarding the need to provide biodiversity enhancements as part of an overall ambition for conserving and enhancing the natural environment. This is a noted sentiment, however reality is that a large number of developments fail to provide meaningful or significant benefits to the natural environment, due to limited opportunities for providing Public Open Space and landscaped areas on site. An updated evidence base is needed and a new approach should be considered, which results in the dedicated allocation of significant amounts of land for enhancements, that can help mitigate carbon emissions and other impacts of development. Looking at the proposed allocations for development, the GNLP proposes a wealth of residential development that ultimately will drain the existing POS provision within the administrative area, and new POS will likely not address the biodiversity implications of development, due to its sporadic, and ad hoc placement within wider developments. As such, it is considered that this blanket approach of stating that net gain will be provided on-site or off-site is unlikely to be effective, and instead a new strategy based on an alternative approach as highlighted by paragraph 35 of the NPPF should be sought. In its current form, the plan is unsound due to this unjustified and ineffective strategy that has not been positively prepared.

**Change suggested by respondent:**

Given the dire need for preserving and enhancing the natural environment, it is the view that large amounts of natural land should be allocated to provide Public Open Space, at a suitable scale that would supplement existing development, ensuring the whole Plan provides biodiversity net gains and ecological enhancements. For example, the land at Racecourse Community Park is an existing Parkland that is underused, but would benefit from additional revenue to facilitate a vast program of works to boost the biodiversity and ecological value of the land once the planned interventions along its boundaries take place. Namely, the extension to the Thickthorn Park & Ride and the A47/A11 Highways England link road. The opening up the park to the public alongside with the limited built development proposed at site GNLP0177-B would result in a range of benefits to economic, social and community infrastructure and contribute positively to the natural environment.

The allocation of this essential green infrastructure and the three relatively small sites which would secure its long-term management and maintenance within GNLP0177-B would protect it for present and future generations and reduce the deterioration of the landscape likely to result from the planned interventions along its boundaries.

As can be seen through the recent COVID-19 pandemic, the importance of accessible public open space within close proximity to homes and places of work is vital to maintaining a healthy lifestyle.

Given the existing infrastructure improvements and the adjacent Park and Ride and its planned extension this site could provide not only large-scale community space for the residents of both Hethersett and Cringleford, but would supplement the public open space provision of other allocations and developments nearby.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Strategic Gap Review - <https://oc2connect.gnlp.org.uk/a/4fm>

Parkland Management Plan - <https://oc2connect.gnlp.org.uk/a/4fn>

Landscape Strategy - <https://oc2connect.gnlp.org.uk/a/4fy>

Aylesbury Vale Process Note Housing for Older People - <https://oc2connect.gnlp.org.uk/a/4fp>

24441

Object

### Site Assessment Booklets and Studies, Sustainability Appraisal Report

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

#### Summary:

Regarding the GNLPs response to point 6: 6 Increased risk of urbanisation of the open countryside and coalescence. A total of 84 allocated sites are located on previously developed land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.

It is important to undertake a new review of the strategic gaps and other areas between settlements at risk of coalescence to provide an up-to-date evidence base to inform new allocations. As such, with a lack of a review regarding the Strategic Gap, especially in light of the new strategic infrastructure works, it is considered that the GNLP is not justified regarding an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence and therefore conflicting with paragraph 35 of the NPPF.

#### Change suggested by respondent:

It is considered that a review into strategic gaps and coalescence should be undertaken. An initial assessment has been completed for the Hethersett- Cringleford strategic gap. A copy is enclosed with this representation. From this we can see that development can be accommodated safely within the identified areas without impacting upon or resulting in coalescence between the two settlements. This would open up highly sustainable land, with a wealth of public benefits and opportunities. As a consequence of this, it is considered that the allocation of small sites within the originally proposed area identified as Hethersett GNLP0177-BR would be sustainable. This has been further evidenced through the procurement of a Parkland Management Plan for the site that would result in a strong preservation and enhancement of not only the historic assets but also the natural assets of the site whilst introducing new community and social infrastructure and opportunities for outdoor leisure and recreation through the creation of permission footpaths and access to the Parkland.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>  
 Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
 ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf - <https://oc2connect.gnlp.org.uk/a/4gs>  
 20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24430

Object

### Policy 5 Homes, Policy 5 Homes

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

The Local Plan identifies a significant need regarding the provision of elderly accommodation. Taking the available evidence, (paragraph 276 of the Strategy and the SHMA) this need is identified as between 2842 and 3857 additional specialist retirement units. The local plan identifies 4 sites to accommodate this additional need, however the sites in combination barely provide in excess of 300 units, leaving a potential 3500 units identified as being unmet by the proposed plan. This has further repercussions for neighbouring authorities who may not be able to take the additional need that would be unmet by dedicated allocations. As such, it is considered that draft Policy 5 in regard to elderly accommodation has not been positively prepared. Draft Policy 5 states that any shortfall shall be met through the requirement of making generic housing be accessible and easily adaptable (20% on all major housing developments). Although this is recognised as one potential solution from a housing perspective, adaptable homes do not facilitate medical care or truly enable the occupiers to remain in perpetuity. When occupiers require a few hours a week of care, this will have to be readily available and will likely result in the need for occupiers to vacate their homes for residential institutions causing much distress and at greater cost. The most efficient and viable from a national perspective, is to provide sites that cater specifically for the needs of older people where care is available 24/7 as needed and medical services can be provided to multiple residents in one trip. Such facilities that are age restricted also allow occupiers to enter before their needs are urgent, allowing them to become more accustomed to their surroundings and generally aid their declining years in comfort, knowing whatever happens they will be looked after. As such, the proposed solution of making multiple small pockets of isolated elderly communities is not considered to be justified as an appropriate strategy. Furthermore, this approach of not addressing and catering for elderly need, rather leaving it to chance for being delivered as part of larger residential schemes is not considered to be consistent with paragraph 61 of the NPPF or in accordance with Inspectors rulings regarding other Local Plan adoption processes (see Aylesbury Vale District Council, Vale of Aylesbury Local Plan Policy H6 (C2) Process Note, July 2019, pp 1-5.). A copy is annexed to this submission.

**Change suggested by respondent:**

Regarding making the plan sound, it is viewed necessary that new sites be considered for allocation that provide dedicated elderly care facilities in meaningful numbers, to foster new elderly communities in sustainable locations and settings conducive to promoting active living as much as possible. It is considered essential that such facilities do not replicate old care-home institutions, but are more akin to the 'care village model', where independence is guaranteed through individual and self-contained accommodation, and both medical and social care are available on site around the clock. This reduces the need for turbulent evictions of those too old or ill to look after themselves and allows residents to retain an active lifestyle through available community facilities and open space in close proximity. Furthermore, through creating safe environments for residents, active social lives can be encouraged, where public open space is provided in abundance for all. This comes without the necessary maintenance issues that would deter older people from utilising private outdoor amenity space such as private gardens in their later years. Through the allocation of specific sites, the identified need is addressed more comprehensively, and this not only satisfies paragraph 61 of the NPPF but accommodates the vision outlined in the Strategy for promoting healthy vibrant lifestyles for communities.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Strategic Gap Review - <https://oc2connect.gnlp.org.uk/a/4fm>

Parkland Management Plan - <https://oc2connect.gnlp.org.uk/a/4fn>

Landscape Strategy - <https://oc2connect.gnlp.org.uk/a/4fy>

Aylesbury Vale Process Note Housing for Older People - <https://oc2connect.gnlp.org.uk/a/4fp>

**24431**

**Object**

**Policy 6 The Economy, Policy 6 The Economy**

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

**Summary:**

Policy 6 of the Regulation 19 draft Greater Norwich Local Plan states that “sufficient employment land is allocated in accessible locations to meet identified need and provide for choice.” This is disputed. The preferred sites and existing allocations do not objectively address identified needs, and that the proposed approach is not justified or sound in accordance with paragraph 35 of the NPPF.

The reliance on existing allocations undermines the policy. The evidence base Employment Land Assessment Addendum 2020 states: “Certain potential sites are large scale brownfield sites which would require significant site clearance and remediation in order to prepare the site for new employment development, which could affect the viability of delivering any form of employment activity on the site.” There is a reasonable alternative site forming a small part of the original site GNLP0177-B which would help to ensure a greater choice of employment venue better suited to the current trend and need for accommodation of a smaller scale in accessible locations. It suffers no significant viability concerns due to contamination and other issues.

**Change suggested by respondent:**

Furthermore, the greater Norwich local plan allocates only 54.2 hectares of employment land for the next 17 years. It is considered that this is an exceptionally conservative estimate and that greater amounts of land may well be needed for future purposes. As already shown through the events of last year during the pandemic it is important to have a choice of places of employment within easy reach of new and existing homes. As such the GNLP needs to be more flexible providing opportunity for new creative industries and encouraging diversity in typology as much as possible to weather future crises. Through the allocation of more employment generating land of the type proposed at the Racecourse Community Park (site GNLP0177-B ) it is considered that the Greater Norwich Local Plan would be more robust as well as the local economy being more resilient through the provision and facilitation of greater choice of employment space and new opportunities close to existing homes and a Park and Ride.

The Greater Norwich Local Plan relies significantly upon undelivered previously allocated land. This land amounts to 229.9 hectares of land, as of April 2018, which will have been undeveloped for multiple reasons. It is fair to assume that not all of these reasons will have been overcome, and other issues impeding delivery have arisen. As such, further employment land, particularly smaller sites, need to be allocated to address existing and anticipated needs as a result of recent trends.

Policy 6 also states that development should seek to enhance the environment and economy of centers and villages with more dispersed services to protect their function and avoid the loss of commercial premises or local services.

As part of the Racecourse Community Park (GNLP0177-B ) a large area of public open space is to be provided. This land not only offers a wealth of biodiversity enhancements but usable public open space that would supplement and enhance the provision offered to both Hethersett and Cringleford. Furthermore, this site would result in more dispersed services within an easily accessible location to both residential areas. As such policy 6 would in theory be supportive of this development coming forward. The small parts of this site proposed for build development would perfectly supplement the employment provision proposed as part of the current draft Greater Norwich Local Plan.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Strategic Gap Review - <https://oc2connect.gnlp.org.uk/a/4fm>

Parkland Management Plan - <https://oc2connect.gnlp.org.uk/a/4fn>

Landscape Strategy - <https://oc2connect.gnlp.org.uk/a/4fy>

Aylesbury Vale Process Note Housing for Older People - <https://oc2connect.gnlp.org.uk/a/4fp>

## Policy 6 The Economy, Policy 6 The Economy

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Policy 6 of the Regulation 19 draft Greater Norwich Local Plan states that “sufficient employment land is allocated in accessible locations to meet identified need and provide for choice.” This is disputed. The preferred sites and existing allocations do not objectively address identified needs, and that the proposed approach is not justified or sound in accordance with paragraph 35 of the NPPF.

The reliance on existing allocations undermines the policy. The evidence base Employment Land Assessment Addendum 2020 states: “Certain potential sites are large scale brownfield sites which would require significant site clearance and remediation in order to prepare the site for new employment development, which could affect the viability of delivering any form of employment activity on the site.” There is a reasonable alternative site forming a small part of the original site GNLP0177-B which would help to ensure a greater choice of employment venue better suited to the current trend and need for accommodation of a smaller scale in accessible locations. It suffers no significant viability concerns due to contamination and other issues.

### Change suggested by respondent:

Furthermore, the greater Norwich local plan allocates only 54.2 hectares of employment land for the next 17 years. It is considered that this is an exceptionally conservative estimate and that greater amounts of land may well be needed for future purposes. As already shown through the events of last year during the pandemic it is important to have a choice of places of employment within easy reach of new and existing homes. As such the GNLP needs to be more flexible providing opportunity for new creative industries and encouraging diversity in typology as much as possible to weather future crises. Through the allocation of more employment generating land of the type proposed at the Racecourse Community Park (site GNLP0177-B ) it is considered that the Greater Norwich Local Plan would be more robust as well as the local economy being more resilient through the provision and facilitation of greater choice of employment space and new opportunities close to existing homes and a Park and Ride.

The Greater Norwich Local Plan relies significantly upon undelivered previously allocated land. This land amounts to 229.9 hectares of land, as of April 2018, which will have been undeveloped for multiple reasons. It is fair to assume that not all of these reasons will have been overcome, and other issues impeding delivery have arisen. As such, further employment land, particularly smaller sites, need to be allocated to address existing and anticipated needs as a result of recent trends.

Policy 6 also states that development should seek to enhance the environment and economy of centers and villages with more dispersed services to protect their function and avoid the loss of commercial premises or local services.

As part of the Racecourse Community Park (GNLP0177-B ) a large area of public open space is to be provided. This land not only offers a wealth of biodiversity enhancements but usable public open space that would supplement and enhance the provision offered to both Hethersett and Cringleford. Furthermore, this site would result in more dispersed services within an easily accessible location to both residential areas. As such policy 6 would in theory be supportive of this development coming forward. The small parts of this site proposed for build development would perfectly supplement the employment provision proposed as part of the current draft Greater Norwich Local Plan.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>  
Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>

ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
 20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24442

Object

## Policy 5 Homes, Policy 5 Homes

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

The Local Plan identifies a significant need regarding the provision of elderly accommodation. Taking the available evidence, (paragraph 276 of the Strategy and the SHMA) this need is identified as between 2842 and 3857 additional specialist retirement units. The local plan identifies 4 sites to accommodate this additional need, however the sites in combination barely provide in excess of 300 units, leaving a potential 3500 units identified as being unmet by the proposed plan. This has further repercussions for neighbouring authorities who may not be able to take the additional need that would be unmet by dedicated allocations. As such, it is considered that draft Policy 5 in regard to elderly accommodation has not been positively prepared. Draft Policy 5 states that any shortfall shall be met through the requirement of making generic housing be accessible and easily adaptable (20% on all major housing developments). Although this is recognised as one potential solution from a housing perspective, adaptable homes do not facilitate medical care or truly enable the occupiers to remain in perpetuity. When occupiers require a few hours a week of care, this will have to be readily available and will likely result in the need for occupiers to vacate their homes for residential institutions causing much distress and at greater cost. The most efficient and viable from a national perspective, is to provide sites that cater specifically for the needs of older people where care is available 24/7 as needed and medical services can be provided to multiple residents in one trip. Such facilities that are age restricted also allow occupiers to enter before their needs are urgent, allowing them to become more accustomed to their surroundings and generally aid their declining years in comfort, knowing whatever happens they will be looked after. As such, the proposed solution of making multiple small pockets of isolated elderly communities is not considered to be justified as an appropriate strategy. Furthermore, this approach of not addressing and catering for elderly need, rather leaving it to chance for being delivered as part of larger residential schemes is not considered to be consistent with paragraph 61 of the NPPF or in accordance with Inspectors rulings regarding other Local Plan adoption processes (see Aylesbury Vale District Council, Vale of Aylesbury Local Plan Policy H6 (C2) Process Note, July 2019, pp 1-5.). A copy is annexed to this submission.

### Change suggested by respondent:

Regarding making the plan sound, it is viewed necessary that new sites be considered for allocation that provide dedicated elderly care facilities in meaningful numbers, to foster new elderly communities in sustainable locations and settings conducive to promoting active living as much as possible. It is considered essential that such facilities do not replicate old care-home institutions, but are more akin to the 'care village model', where independence is guaranteed through individual and self-contained accommodation, and both medical and social care are available on site around the clock. This reduces the need for turbulent evictions of those too old or ill to look after themselves and allows residents to retain an active lifestyle through available community facilities and open space in close proximity. Furthermore, through creating safe environments for residents, active social lives can be encouraged, where public open space is provided in abundance for all. This comes without the necessary maintenance issues that would deter older people from utilising private outdoor amenity space such as private gardens in their later years. Through the allocation of specific sites, the identified need is addressed more comprehensively, and this not only satisfies paragraph 61 of the NPPF but accommodates the vision outlined in the Strategy for promoting healthy vibrant lifestyles for communities.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>  
 Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
 ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
 20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

24447

Object

## Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement

**Respondent:** Trustees of First Viscount Mackintosh of Halifax and Trustees of CM Watt Residual Trust [20072]

**Agent:** La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]

### Summary:

Policy 3 is a standard policy that is adopted by most LPA's regarding the need to provide biodiversity enhancements as part of an overall ambition for conserving and enhancing the natural environment. This is a noted sentiment, however reality is that a large number of developments fail to provide meaningful or significant benefits to the natural environment, due to limited opportunities for providing Public Open Space and landscaped areas on site. An updated evidence base is needed and a new approach should be considered, which results in the dedicated allocation of significant amounts of land for enhancements, that can help mitigate carbon emissions and other impacts of development. Looking at the proposed allocations for development, the GNLP proposes a wealth of residential development that ultimately will drain the existing POS provision within the administrative area, and new POS will likely not address the biodiversity implications of development, due to its sporadic, and ad hoc placement within wider developments. As such, it is considered that this blanket approach of stating that net gain will be provided on-site or off-site is unlikely to be effective, and instead a new strategy based on an alternative approach as highlighted by paragraph 35 of the NPPF should be sought. In its current form, the plan is unsound due to this unjustified and ineffective strategy that has not been positively prepared.

### Change suggested by respondent:

Given the dire need for preserving and enhancing the natural environment, it is the view that large amounts of natural land should be allocated to provide Public Open Space, at a suitable scale that would supplement existing development, ensuring the whole Plan provides biodiversity net gains and ecological enhancements. For example, the land at Racecourse Community Park is an existing Parkland that is underused, but would benefit from additional revenue to facilitate a vast program of works to boost the biodiversity and ecological value of the land once the planned interventions along its boundaries take place. Namely, the extension to the Thickthorn Park & Ride and the A47/A11 Highways England link road. The opening up the park to the public alongside with the limited built development proposed at site GNLP0177-B would result in a range of benefits to economic, social and community infrastructure and contribute positively to the natural environment.

The allocation of this essential green infrastructure and the three relatively small sites which would secure its long-term management and maintenance within GNLP0177-B would protect it for present and future generations and reduce the deterioration of the landscape likely to result from the planned interventions along its boundaries.

As can be seen through the recent COVID-19 pandemic, the importance of accessible public open space within close proximity to homes and places of work is vital to maintaining a healthy lifestyle.

Given the existing infrastructure improvements and the adjacent Park and Ride and its planned extension this site could provide not only large-scale community space for the residents of both Hethersett and Cringleford, but would supplement the public open space provision of other allocations and developments nearby.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes



**duty:****Appear exam:** Appearance at the examination

**Attachments:** 20200817 -Review of Strategic Gap.pdf - <https://oc2connect.gnlp.org.uk/a/4fq>  
 Racecourse Hub - Landscape Strategy 060820.pdf - <https://oc2connect.gnlp.org.uk/a/4gr>  
 ED212B Policy H6 Use Class C2 Accommodation Process Note (July 2019).pdf -  
<https://oc2connect.gnlp.org.uk/a/4gs>  
 20210305 - PMP.pdf - <https://oc2connect.gnlp.org.uk/a/4gt>

**24386****Support****Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Petition:** 2 petitioners**Summary:**

Policy 2

This policy addresses a number of key issues including the need for among other things, sustainable access to on-site services and facilities reducing the need to travel. The policy appears to be sound.

**Change suggested by respondent:**

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**Legally** Not specified**compliant:****Sound:** Yes**Comply with** Not specified**duty:****Appear exam:** Appearance at the examination**Attachments:** None

24387

Support

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Petition:** 2 petitioners**Summary:**

Policy 6

The policy states that small scale retail and leisure developments serving local needs are encouraged to serve new residential developments in existing residential areas promoting active travel. It discusses the importance of providing choice retaining and allocating smaller scale employment sites. The policy appears to be sound.

**Change suggested by respondent:**

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**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

24388

Support

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Petition:** 2 petitioners**Summary:**

Policy 7.1

The policy states among other things, that elsewhere in the fringe parishes a range of sites will be provided for different types of employment and community uses and promote walking and cycling. This policy appears to be sound.

Although individually, the above policies appear be sound the overall Plan is not effective without allocations of smaller employment sites in key locations to address the impact of housing growth. Site GNLP3024 is a key allocation to be provided at Sprowston. The Plan would be unsound without it. In addition, a review of the settlement boundary of the town is necessary as it is incorrect as shown on the map regarding Sprowston.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Yes

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

24402

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Summary:**

The plan is unsound and unjustified.

As part of the Greater Norwich Local Plan, an understanding of the relevant evidence base is necessary to derive an appropriate strategy. No up-to-date assessment of Public Open Space (POS) needs has been provided, which affects future and existing residential amenity. A Public Open Space Assessment has been undertaken for Sprowston East. The study shows deficits in certain typologies of public space (namely Parks and Gardens -3.21ha, Amenity Green Space -3.30ha, and Playing Pitches -5.10ha). This would be exacerbated by the planned growth in Sprowston (LAPs -0.21ha, Parks and Gardens -6.01ha, Amenity Green Space -5.40ha, Playing Pitches -9.30ha). The Open Space Assessment is available in full upon request. The plan is not justified as it is based on an inadequate evidence base. As a result, reasonable alternatives cannot be considered in accordance with paragraph 35 of the NPPF.

**Change suggested by respondent:**

An up-to-date evidence base in relation to the current and proposed open space and play space provision is required to inform the Strategy and proposed allocations.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Not specified**Attachments:** None

24389

Object

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**Sprowston, Settlement Map****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Petition:** 2 petitioners**Summary:**

Proposed Allocation GNLP3024

This proposed allocation of this business and community hub adjacent to allocation GNLP0132 would secure essential social and community infrastructure in close proximity to the new and existing homes in the locality, and better facilitate Sprowston's future planned growth and expansion. The SoCG (copy enclosed for ease of reference) and previous representations outline the mix of uses intended. There is extant planning consent for a mix of commercial and community uses. However, further flexibility is sought to complement the neighbouring developments. The allocation of this site would help to secure its future viability and deliverability and provide much needed extended services and amenities to serve the local growing population.

**Change suggested by respondent:**

The allocation of small and medium-sized sites to provide services and amenities to support major housing allocations where these can be accessed by alternative modes to the private car. A key example is site GNLP3024 at Sprowston.

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** None

24404

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Summary:**

This policy is not effective. Although it requires provision or enhancement of adequate green infrastructure, it does not provide any clear guidance on the need to be met, nor is there defined elsewhere in the Plan. As a result, the need to be met by new developments is not adequately fulfilled.

**Change suggested by respondent:**

To be more effective the Plan needs to be based on a more up to date evidence base and identify more green infrastructure particularly in proximity to large strategic allocations as is the case at Sprowston.

The redevelopment of the site of the Sprowston Sports and Social Club to provide beautiful, high-quality, much needed new homes for older people and open space and play facilities accessible to all. In the form of a public park, would be a much more efficient use of land in keeping with the principles and objectives of the sustainable development expressed in the NPPG, National Planning Policy Framework, GNLP Pre-Submission Draft Strategy and recent government policy requiring all new developments to meet local standards of beauty, quality and design. It would set an example of the high quality, beautifully designed places expected from every development throughout the plan period and beyond.

It would meet the three overarching objectives and purpose of planning; that is, ensuring a more responsive and competitive local economy and coordinating the provision of infrastructure (the economic objective of sustainable development), support strong, vibrant and healthy communities through provision of accessible open spaces where it is needed (the social objective) and through making more efficient use of brownfield land to encourage healthier, more active lifestyles (the environmental objective).

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

24403

Object

**Policy 2 Sustainable Communities, Policy 2 Sustainable Communities****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]

**Summary:**

The GNLP has admirable ambitions regarding the delivery of Green Infrastructure, however the proposed allocations do not reflect the policy aspirations of the plan resulting in this not being effective or deliverable in conflict with policy 35 of the NPPF. The NPPF, echoes the GNLP through placing a great emphasis on not only the preservation of existing green infrastructure, but also on the creation of new more accessible green infrastructure.

Policy 2 requires the following key sustainable development objectives to be met:

- Provision of accessible social and community infrastructure
- Making more effective use of land
- Contributions to multi-functional green infrastructure links
- Provision of safe and accessible open spaces available to all ages encouraging walking and cycling, increased opportunities for social interaction and for living healthier, more active lifestyles.

However, the plan is not effective in achieving the requirements of Policy 2. In particular, at Sprowston, where insufficient land has been allocated (and insufficient provision made in the new allocation) to take account of the economic, housing and open space needs of all ages.

**Change suggested by respondent:**

The evidence base needs to be brought up-to-date.

At Sprowston, a new site needs to be identified to provide a LEAP and more accessible public open space in the form of a local park and garden.

Proposed policies should actively support developments that would link existing areas of green infrastructure (GI) and require the provision of POS and GI where possible to link and interconnect with existing provision nearby. Additionally, it is considered that proposed allocations should set an exemplary way forward, aligning the policies for future developments to achieve this. As such, allocations should be promoted that contribute to the creation of new links between existing GI and contribute to an area-wide green infrastructure network. For example, the land at the Sprowston Sports and Social Club, surrounded by allocation GT5 in the Growth Triangle Area Action Plan would see the linking of an existing natural woodland, with a new proposed community park and garden, which could then link into the new playing fields/skate park being proposed in the south western edge of GT5. Such a proposal would exemplify the policy aspirations of linking existing Green Infrastructure into a more local network, whilst also providing new, much needed POS as highlighted by the Open Space Assessment for Sprowston.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24405

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Summary:**

Policy 5 has not been positively prepared, is unjustified, ineffective, and inconsistent with national policy as it fails to secure a suitable strategy to deliver high-quality elderly accommodation in sufficient numbers to address an identified need.

Paragraphs 275 to 277 of the GNLP discuss an identified need regarding elderly accommodation (there is discrepancy in the councils figures regarding need with 2842, 3857, and 3909 spaces identified as needed). The GNLP identifies the strategy to address this need through a mix of allocated sites (4 in total, equating to approximately 300 spaces) and the rest of the identified need to be taken up on housing allocations. It is known that having a small proportion of elderly needs units on larger allocations creates a poor quality of life for residents, as they are typically isolated, away from POS and interaction with others. Additionally, such policies have additional viability implications, potentially undermining housing allocations. This is reinforced by the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, summarising that specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This is reflected in paragraphs 59 to 61 of the NPPF where a variety of land is needed to come forward to ensure the needs of groups with specific requirements are addressed.

The current plan places a great emphasis on the delivery of elderly accommodation through housing allocations, which is not considered to be an effective or justified strategy, nor a strategy consistent with national policy.

**Change suggested by respondent:**

It is considered that to make the plan sound, a significant number of dedicated allocations should be made regarding the provision of elderly accommodation. It is considered that traditional C2 institutions are not the answer, but instead the promotion of 'care villages' where semi-independence can be secured for elderly people, with care and welfare available on site as their health deteriorates. Given the substantial need, it is considered that a policy supporting elderly care provision is not sufficient, and that as a strategic priority more dedicated sites should be allocated to provide elderly accommodation.

One potential site that could be allocated to help address the need is the Sprowston Sports and Social Club. The loss of the site would be mitigated through the allocation of a care village, providing necessary social infrastructure.

Additionally, with the provision of POS on site, it would benefit the local community whilst encouraging a healthier and active lifestyle for the elderly residents, adhering to the aspirations of the GNLP.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None



24406

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Trustees of Richard Gurney Children's Settlement [20007]**Agent:** Mrs Nicole Wright [14312]**Summary:**

This policy does not address the need to allow room for change in existing businesses affected by the recent and current issues such as the pandemic. It is not effective, positively prepared or justified given the evidence base of the plan. As such, it is not consistent with paragraph 11 a) of the NPPF requiring plans to be positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

Paragraph 71 of the GNLP Pre-Submission Draft Strategy states that: "The GNLP should support the growth of a wide ranging and changing economy, ranging from high tech businesses with the capacity for major growth through to smaller rural enterprises."

Paragraph 127 states that: "Generating the right level of growth in the right places will help our local economy by stimulating economic investment, new infrastructure, new technologies and environmental improvements. This will improve access across Greater Norwich to services and jobs, and lead to better environmental quality.

As per paragraph 35 of the NPPF, local plans are required to be consistent with national policy. Paragraph 80 of the NPPF states "Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future." Businesses, such as the Sprowston Sports and Social Club face an uncertain future and there should be policy considerations to address these concerns for local businesses to allow for diversification, or at least policy support that sees local businesses that are forced to closed to be replaced in part with new assets that serve local communities, such as a new Park and Garden that addresses a local deficit.

The failure to address these issues directly conflicts with paragraph 35 of the NPPF .

**Change suggested by respondent:**

Policy 6 needs to be adapted to provide a more flexible framework to encourage the sustainable change of use of existing land and businesses affected by the pandemic.

.....

For example, the site of the Sprowston Sports and Social Club is located in a sustainable location close to new housing allocations where it would be appropriate to provide a mix of publicly accessible open space alongside housing for older people with care and amenities shared with the wider community in line with the ambitions of paragraphs 46 and 47 of the Pre-Submission Draft Strategy.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** None

24427

Object

## Policy 7.5 Small Scale Windfall Housing Development, Policy 7.5 Small Scale Windfall Housing Development

**Respondent:** Trustees of Richard Gurney Children's Settlement [20007]

**Agent:** La Ronde Wright (Mr David Jones, Senior Planner) [20006]

### Summary:

Policy 7.5 is not positively prepared or justified as it does not take account of the disparate characteristics of the 'smaller parishes' and 'larger parishes' in Greater Norwich. Within the larger parishes group highly sustainable settlements where at least up to 9 dwellings could be accommodated, for instance those in the Norwich Urban Fringe.

The recently published Builder Better Commission report and the Government's Design Code Template encourage development that respond to local area characteristics.

### Change suggested by respondent:

Policy 7.5 should be modified to include a new category of parishes: those which are within the Norwich Urban Fringe, with this category permitting up to 9 dwellings.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Map of site embedded in document - <https://oc2connect.gnlp.org.uk/a/4fz>

24426

Object

## Sprowston, Settlement Map

**Respondent:** Trustees of Richard Gurney Children's Settlement [20007]

**Agent:** La Ronde Wright (Mr David Jones, Senior Planner) [20006]

### Summary:

The Town has undergone significant growth in recent years and it is important to review its settlement boundary to ensure that it is positively and effective.

Paragraph 3.63 provides for this wide area of the Norwich Urban Fringe only one site allocation for housing. This is a single large allocation of 1,200 homes. The paragraph notes that only 26 additional dwellings are accounted for by small sites, which represents an inadequately small number and proportion of such new homes. Although the paragraph notes that the allocations identified in the Growth Triangle Area Action Plan will not be superseded by the GNLP, this fails to reflect that not all the land adjacent to the Sprowston settlement boundary falls within that Area Action Plan. T

The Plan is not consistent with national policy. NPPF paragraph 68 states that "small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved". Additional small allocations should be considered in the town or the windfall policy needs to respond to the need for smaller sites to improve deliverability. One such site could be that of the old sawmill at Blue Boar Lane opposite the Sprowston Sports and Social Club. With the development boundary adjusted in this location the site could come forward in this sustainable location within 3 years.

**Change suggested by respondent:**

Allocation of the site comprising land to the west of Blue Boar Lane [site plan enclosed], or its inclusion otherwise within the Sprowston development boundary, would be both consistent with national policies and provide an effective and justified strategy in delivering the new housing needed to meet the area's objectively assessed needs.

NPPF paragraph 68 requires the identification of sites less than 1ha to promote the development of a good mix of sites. The paragraph notes that small sites "make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly". The site west of Blue Boar Lane would provide such a small and deliverable site, measuring 0.6ha, and capable of providing 7 family homes of varying sizes. (For clarity, the area and housing referred to does not include the two existing houses, 156 & 158 Blue Boar Lane.)

The site is located entirely outside of the Growth Triangle Area Action Plan (2016) as defined in the Broadland Site Allocations Development Plan Document (2016) and the current GNLP Sprowston Settlement Map. Policy GT 2 of that Area Action Plan therefore does not apply to the site, notwithstanding the indication by the plan to the AAP of a Secondary Corridor under that policy applying to a small part of the site.

A part of the site already falls within the existing development boundary as defined in the Broadland Site Allocations Development Plan Document (2016) and the current GNLP Sprowston Settlement Map. This reflects the situation that the land forms a contiguous part of the existing built up area of Sprowston.

The site, as a former sawmill (use class B2) and with remaining access, hardstanding and fixtures, is brownfield or previously developed land, as defined in the NPPF ("Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.") NPPF paragraph 117 requires that "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" and paragraph 118 requires that "Planning policies and decisions should: c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" and d) "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively".

Furthermore, the site is 1.25km from the nearest listed building and there are no other heritage assets in the vicinity.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Map of site embedded in document - <https://oc2connect.gnlp.org.uk/a/4fz>

24098

Object

**Policy 7.6 Preparing for New Settlements, Policy 7.6 Preparing for New Settlements****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352)

**Change suggested by respondent:**

Please see the section addressing Policy 7.6 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24099

Object

**Brundall, 5.18****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the section addressing the Sites Plan in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24100

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLPO352).

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 1 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>  
Appendix 2 - School and Childcare Sufficiency Statement in Norfolk - <https://oc2connect.gnlp.org.uk/a/49c>  
Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24101

Object

**Policy 3 Environment Protection and Enhancement, Policy 3 Environmental Protection and Enhancement****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the section addressing Policy 3 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24102

Object

**Policy 4 Strategic Infrastructure, Policy 4 Strategic Infrastructure****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 4 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the section addressing Policy 4 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>



24103

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the sections addressing Procedural Policy 5 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the sections addressing Procedural Issues and Policy 5 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -  
<https://oc2connect.gnlp.org.uk/a/49c>

Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24104

Object

**Policy 6 The Economy, Policy 6 The Economy****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 6 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the section addressing Policy 6 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24105

Object

**Policy 7.1 The Norwich Urban Fringe Area including the Fringe Parishes, Policy 7.1 The Norwich Urban Area including the Fringe Parishes****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the section addressing Policy 7.1 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

24106

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Trustees of WJ Gowing 1985 Settlement & the Howard Trust [20047]**Agent:** Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]**Petition:** 2 petitioners**Summary:**

Please see the section addressing Policy 7.3 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352).

**Change suggested by respondent:**

Please see the section addressing Policy 7.3 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Appendix 1 - Delivery Statement - <https://oc2connect.gnlp.org.uk/a/49b>

Appendix 2 - School and Childcare Sufficiency Statement in Norfolk -

<https://oc2connect.gnlp.org.uk/a/49c>Full Representation - <https://oc2connect.gnlp.org.uk/a/49d>

23242

Object

**Aylsham, 4.5****Respondent:** Mr Peter Tubby [19780]**Summary:**

I understood that the preferred option was for one site for up to 300 homes. By selecting two sites rather than one almost doubles the housing allocation without consultation on the affect on the town infrastructure. There are already issues with traffic on the local roads and whether local schools and health providers could accomodate the increase in population.

**Change suggested by respondent:**

Stick to just one site and provide the necessary town infrastucture.

If both sites were to go ahead phased development should be considered (including a school in the first stage) so that the town and infrastructure has time to adjust.

What procedures are in place to ensure developers adhere to the policies in the plan i.e. Regarding layout and design to take account of noise from the adjacent A140, and landscaping to screen impact on the countryside setting to the south.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23475

Object

**Aylsham, 350****Respondent:** Mrs Grizelda Tyler [19779]**Summary:**

No consultation with residents, Town Council or elected councillors on this increase since Reg. 18. A 15% up lift on what has already been agreed is excessive. Infrastructure has not been improved to cope with existing new developments, lack of schools, GP surgeries, car parking are already putting massive strain on the medieval town. Existing new developments suffer from lack of care in the planning and building, sewage lorries going in weekly to remove sewage, flooding, subsidence etc. No jobs in Aylsham, commuting essential so Govt. Green agenda ignored. Exclusion of Aylsham Councillors means residents are disenfranchised and ignored.

**Change suggested by respondent:**

Firstly residents need to be consulted, Town Council needs to be consulted, need for housing should be analysed, 1.000,000 people left UK, population dropping, availability of employment, some housing potentially needed in Aylsham but not on this scale, some could be transferred to Norwich to convert empty offices and retail outlets into housing thus reducing need to commute and revitalising Norwich City Centre, affordable housing into villages, use your imagination don't just go for the easy option which often results in killing the golden goose.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

24434

Object

**Aylsham, Settlement Map****Respondent:** Mr R Tyler [20010]**Summary:**

I object to the draft proposals under Reg 19 on the basis that the plan's preparation is not compliant with the regulations and must therefore be outside the law.

Reg 18 stated that Aylsham would have ONE housing allocation site (300 dwellings). Consultation took place. Reg 19 states that there will be TWO housing sites (550 dwellings). This massive increase, possibly a 83.3% uplift in housing numbers has never been consulted upon. It should have been.

The proposals are not sound as Reg 19 fails to consider the impact of the two sites (550 dwellings) on the carbon footprint, societal aspects, nor the infrastructure needs of Aylsham including utilities, roads, health facilities and schools.

In addition to the above specific points I make the general point that seemingly ignoring or even overriding the consultation process destroys trust between the governed and the governors. It also really irritates the electorate.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24074

Object

**Policy 5 Homes, Policy 5 Homes****Respondent:** University of East Anglia [16297]**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]**Petition:** 2 petitioners

**Summary:**

The policy's objective of encouraging the delivery of Purpose-Built Student Accommodation (PBSA) to support the growth of the University is, in principle, supported.

Away from the UEA campus, the draft policy states that proposals for PBSA will be supported where the need for the development is justified by the current or proposed size of Norwich's higher education institutions, and the proposals will adhere to a range of criterion.

One of these criterion requires off-campus PBSA to make provision for a policy-compliant proportion of affordable housing that would be expected if the site were developed for general needs housing.

This element of the policy is considered unsound, as PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64 of the NPPF specifies that, where the provision of housing is proposed, at least 10% of the homes should be made available for affordable home ownership. Paragraph 64(b) of the NPPF states that PBSA is exempt from this 10% requirement.

On this basis, to ensure that the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to recognise that PBSA should not be expected to contribute towards affordable housing provision.

**Change suggested by respondent:**

Please see the separate sheet appended to this representation.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** Appendix - <https://oc2connect.gnlp.org.uk/a/49s>

**24075****Support****Policy 0133C, Policy 0133C**

**Respondent:** University of East Anglia [16297]

**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]

**Petition:** 2 petitioners

**Summary:**

On behalf of our clients University of East Anglia, we support the proposed allocation of Policy GNLP0133-C – Land North of Cow Drive, within the Pre-Submission (Reg 19) Joint Local Plan.

Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the following reasons:

**Suitable**

The identification of the site as a preferred allocation will help to support the expansion of the UEA, alongside sustaining and enhancing the valuable role which the UEA holds for Norwich and the wider context. The UEA are fully committed to development on this site, and view it as an integral part of meeting the UEA's future growth requirements.

**Available**

The site, in its entirety, is owned by the UEA, and there are no leases or restrictive covenants on the site. The availability of the site has been demonstrated by the extant planning consent on the site. Consequently, the site is readily available for development

**Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of student accommodation on the site. In addition the achievability of the site has been demonstrated by the extant planning consent on the site. Therefore, the development of student accommodation on the site is deemed to be entirely achievable.

**Viable**

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site. The viability of development on the site has been demonstrated by Phase 1 (Blocks A and B), which have been completed on the site.

**Change suggested by respondent:**

-

**Legally compliant:** Yes

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24076

Support

**Policy 0133BR, Policy 0133BR**

**Respondent:** University of East Anglia [16297]

**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]

**Petition:** 2 petitioners



**Summary:**

On behalf of our clients the University of East Anglia, we support the proposed allocation of Policy GNLP0133-BR – Land adjoining the Enterprise Centre at Earlham Hall, within the Pre-Submission (Reg 19) Joint Local Plan.

A minor modification to policy wording, specified within Section 6 of this document, outlines the amendment we consider is necessary to achieve legal compliance.

Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the following reasons:

**Suitable**

The identification of the site as a draft allocation will help to support the expansion of the UEA, alongside sustaining and enhancing the valuable role which the UEA holds for Norwich and the wider context. The UEA are fully committed to development on this site, and view it as an integral part of meeting the UEA's future growth requirements.

**Available**

The site, in its entirety, is owned by the UEA, and there are no leases or restrictive covenants on the site. Consequently, the site is readily available for development.

**Achievable**

There are no site-specific constraints which could preclude the delivery of university related uses on the site. Therefore, delivery of university related uses on the site is deemed to be entirely achievable.

**Viable**

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

**Change suggested by respondent:**

To ensure the legal compliance of the policy wording, we would suggest that reference to 'Use Class F1' is revised to read 'Use Class F.1'. This is suggested to ensure exact compliance with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

**Legally compliant:** No

**Sound:** Yes

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24077

Support

**Policy 0133E, Policy 0133E**

**Respondent:** University of East Anglia [16297]

**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]

**Petition:** 2 petitioners

**Summary:**

On behalf of our clients the University of East Anglia, we support the proposed allocation of Policy GNLP0133-E – Land at the UEA Grounds Depot Site, within the Pre-Submission (Reg 19) Joint Local Plan.

A modification to policy wording, specified within Section 6 of this document, outlines the amendment we consider is necessary to achieve soundness. Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the following reasons:

**Suitable**

The identification of the site as a draft allocation will help to support the continued expansion of the UEA, alongside sustaining and enhancing the valuable role which the UEA holds for Norwich and the wider context. The UEA are fully committed to development on this site, and view it as an integral part of meeting the UEA's future growth requirements.

**Available**

The site, in its entirety, is owned by the UEA, and there are no leases or restrictive covenants on the site. Consequently, the site is readily available for development.

**Achievable**

There are no site-specific constraints which could preclude the delivery of student accommodation and a small element of ancillary university related uses. Therefore, student accommodation and a small element of ancillary university related uses development on the site is deemed to be entirely achievable

**Viable**

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

**Change suggested by respondent:**

To ensure the soundness of the policy wording, we would suggest that Point 6 of the Policy GNLP0133-E is revised to read as follows: 'Include an enhanced pedestrian and cycling connection through the site from Bluebell Road to the Broad, and linkages to and along the open river valley landscape to the south and east'.

The deletion of the remainder of this element of policy wording is considered necessary to secure the deliverability of all elements of Policy GNLP0133-E. The Bartram Mowers site is not within the University's land control, so enhancement of linkages to open spaces within this site, and the development as approved through application ref: 19/00911/F, cannot be guaranteed.

In addition, the following changes to policy wording are recommended, to assist in developing the design proposals for the site during the Plan period:

Point 2 to be reworded as follows: 'Generally low-rise development (at least 2-3 storeys) however acknowledging the enclosed nature of the site, the scale/building height of any proposed development will be tested against an assessment of its landscape and visual impact, to consider the impact on adjoining residential properties and established open space'

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24078

Support

**Policy 0133DR, 0133DR Policy****Respondent:** University of East Anglia [16297]**Agent:** Bidwells (Mr Jake Lambert, Graduate Planner) [14371]**Petition:** 2 petitioners**Summary:**

On behalf of our clients the University of East Anglia, we support the proposed allocation of Policy GNLP0133-DR – Land Between Suffolk Walk and Bluebell Road, within the Pre-Submission (Reg 19) Joint Local Plan.

A modification to policy wording, specified within Section 6 of this document, outlines the amendment we consider is necessary to achieve legal compliance.

Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the following reasons:

**Suitable**

The identification of the site as a draft allocation will help to support the expansion of the UEA, alongside sustaining and enhancing the valuable role which the UEA holds for Norwich and the wider context. The UEA are fully committed to development on this site, and view it as an integral part of meeting the UEA's future growth requirements.

**Available**

The site, in its entirety, is owned by the UEA, and there are no leases or restrictive covenants on the site. Consequently, the site is readily available for development.

**Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of academic and non-academic university related development on the site. Therefore, academic and non-academic development on the site is deemed to be entirely achievable.

**Viable**

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

**Change suggested by respondent:**

To ensure the soundness of the policy wording and associated preamble text, we would suggest that Paragraph 2.39 is revised to delete the following text: 'Since the proposal involves the loss of existing open space, any development must include the opening up of new areas for public access as compensation for this loss'

The University campus, and associated University-owned and managed open spaces, are free for the public to access and enjoy. As the vast majority of University-owned open spaces are not impacted by Policy GNLP0133-DR, it is not considered that this wording is justified or necessary.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** None

24079

Support

**Policy COL2/0140C, COL2/0140C Policy****Respondent:** University of East Anglia [16297]**Petition:** 2 petitioners**Summary:**

On behalf of our clients University of East Anglia, we support the proposed allocation of Policy GNLP0140-C, within the Pre-Submission (Reg 19) Joint Local Plan.

Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the following reasons:

**Suitable**

The identification of the site as a draft allocation will help to support the expansion of the UEA and the wider NRP, alongside sustaining and enhancing the valuable role which the UEA and NRP hold for Norwich and the wider context. The UEA are fully committed to development on this site, and view it as an integral part of meeting the UEA's future growth requirements. Given that the site benefits from historic planning consent for an Innovation Centre (reference: 2008/0736), the suitability of development on the site has been previously established.

**Available**

The UEA are long-term leaseholders of the site. It is anticipated that development on the site would commence within the plan period, noting the expiry of the current use in 2027.

**Achievable**

Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of Class E Science Park development, hospital expansion and other proposals ancillary and complementary to these uses.

**Viable**

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site.

**Change suggested by respondent:**

-

**Legally** Yes  
**compliant:**

**Sound:** Yes

**Comply with** Yes  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23264

Support

**Policy 5 Homes, 271****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

Acle Parish Council supports the requirement for 33% affordable housing on new sites.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified**Sound:** Not specified**Comply with duty:** Not specified**Appear exam:** Not specified**Attachments:** None

23414

Object

**Homes, 133****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

Where is the proof that high quality homes are being built? Recent new homes in Acle were built to a low standard and have flooded twice in heavy rain.

**Change suggested by respondent:**

The minimum quality for new homes needs to be specified and made legally enforceable.

**Legally compliant:** No**Sound:** No**Comply with duty:** Yes**Appear exam:** Written Representation**Attachments:** None

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**23419****Object**

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**Acle, 5.3**

**Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]

**Summary:**

There was no consultation on the 340 new homes. The consultation was only for 200 homes. The SCI has not been complied with. Many objections were made by residents for the 200 homes.

**Change suggested by respondent:**

Re-consult

Legally No  
compliant:

Sound: No

Comply with Yes  
duty:

Appear exam: Written Representation

Attachments: None

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**23421****Object**

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**Policy 0378R/2139R, 0378R/2139R Policy**

**Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]

**Summary:**

The land is at risk of flooding from the nearby reservoir

**Change suggested by respondent:**

Reduce the number of homes to take the flood risk into account.

Legally No  
compliant:

Sound: No

Comply with Yes  
duty:

Appear exam: Written Representation

Attachments: None

23411

Object

**Policy 7.3 The Key Service Centres, Policy 7.3 The Key Service Centres****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

Broadland District Council's Statement of Community Involvement (2016) has not been complied with. Acle Parish Council and Acle residents were consulted on a proposal for an additional 200 homes. Despite many objections to this proposal for 200 new homes, the current Reg 19 document proposes 340 new homes, without having consulted on these additional 140 homes.

The proposal for the 340 homes on land to the west of the village was posted on the Reg 18 consultation as an attachment to a message of support from the landowner, so no one saw it...

**Change suggested by respondent:**

Land needs to be earmarked for future expansion of Acle Academy, and protected as such.

The development risks affecting the environmental importance of the track from Mill Lane in Acle to The Windle. Norfolk County Council's Environmental Policy states that there is a principle of an "environmental net gain" for any development. Currently this track goes across open fields, and is a popular walk for local residents. This would not been the same if the track crosses a housing estate!

In general, housing numbers need to be carefully planned, and villages supported to integrate new housing and new residents. Acle's sewerage system is recorded by Anglian Water as being above capacity already.

There is no access to the eastbound A47 from the west of the village so any new housing will result in a large increase in traffic along the narrow main street. A sliproad onto A47 is required to support larger housing numbers.

The proposal for Acle includes a link road from South Walsham Road to Norwich Road. This is welcomed and must be made a condition on any additional housing. However, without the sliproad onto A47, this will only help to remove some of the traffic from the village.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23413

Object

**Addressing Climate Change, Climate Change Statement****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

The plans are flawed. By placing such emphasis on the public transport available in larger villages and towns, you ignore the fact that the bus takes you into central Norwich, but it is then very difficult to get to any out of town employment centres, so everyone drives their car instead. The plans talk about reducing car parking on housing estates but then everyone has two cars and parks them across the pavements

Also, by requiring a high density for new housing, private gardens are too small, resulting in families driving around Norfolk to get some fresh air.

**Change suggested by respondent:**

Improve public transport links to places other than the centre of Norwich.

Build the station at the Postwick park and ride to allow people to get off the train and get the bus into Norwich and people to park at Postwick and get the bus to Yarmouth...

Subsidise park and ride to make the cost more appealing. At the moment the cost is not significantly low to make it worth the wait in the cold for the bus.

Insist on larger gardens for new homes and more open spaces for play on estates.

Provide more parking for new homes.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23415

Object

**Homes, 136****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

The proposed density for new housing in Acle is not appropriate. The gardens are too small, resulting in people getting into their cars to travel to green space for recreation. The roads are too narrow, especially when people park on the pavements, because of inadequate parking. Parking also needs to be provided for visitors and tradespeople.

**Change suggested by respondent:**

Reduce the density of new housing

Provide more parking for new housing

Provide more parking on estates for visitors and tradespeople

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None



23417

Object

**Infrastructure, 141****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

Where is the evidence for this major shift away from private cars? Norfolk is a large, mostly rural county, with many villages with no public transport. These residents will still be driving to work. Public transport links only work in and out of town/city centres. Public transport is slow from, say Acle, into Norwich and the out to a business park. Much easier to drive!

**Change suggested by respondent:**

Public transport links need to be improved to out of town locations.  
 More public transport is needed for rural areas and smaller villages.  
 Car share schemes could be encouraged.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23418

Object

**Environment, 146****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

Where is the evidence for this claim. Queuing traffic causes pollution on all the access roads into Norwich. Residents who live in rural areas and smaller villages have no choice but to drive into larger towns and the city.

**Change suggested by respondent:**

Improve public transport for rural areas and smaller villages.  
 Improve walking and cycling routes into Norwich centre away from roads.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

23420

Object

**Policy 0378R/2139R, 0378R/2139R Policy****Respondent:** Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]**Summary:**

Planning permission for the allocation ACL1 conditioned a hectare of public open space to be provided near to the site. The proposed housing allocation for 340 homes is where this open space was promised.

**Change suggested by respondent:**

Include one hectare of good quality open space in any plans for housing, as well a new allocation of open public space for the new homes, on a site that is easily accessible for local residents and on level land (ie not including the slopes of the valley)

Link this to the public right of way from Mill Lane to provide enhanced protection for this important environmental space.

**Legally** No**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** None

24352

Object

**R17, R17 Policy****Respondent:** Van Dal Footwear Ltd [19522]**Agent:** Mrs Sarah Clinch [19334]**Summary:**

Our comments relate only to Policy R17: Site of former Van Dal Shoes which we do not consider is justified or effective. The policy therefore fails the soundness test.

Please see the attached letter.

**Change suggested by respondent:**

Policy R17 should be updated as described in the attached letter.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Written Representation**Attachments:** GNLP Reg 19 Repls - Lanpro for Van Dal Footwear Ltd.pdf - <https://oc2connect.gnlp.org.uk/a/4w8>

23828

Object

**Introduction, 300****Respondent:** ABZAG LTD (Mr shaun vincent) [19528]**Summary:**

The site assessment is flawed. Site GNLP0514 incorrectly classed as 'unreasonable' when all rational identifies it as sustainable which demonstrates a lack of soundness. Site GNLP0514 should be added to the list of "preferred sites" to correct this error.

Representation amended 29/07/2021 following request from respondent see attachment for the changes to the original submission.

**Change suggested by respondent:**

The site assessment is flawed. Site GNLP0514 incorrectly classed as 'unreasonable' when all rational identifies it as sustainable which demonstrates a lack of soundness. Site GNLP0514 should be added to the list of "preferred sites" to correct this error.

Representation amended 29/07/2021 following request from respondent see attachment for the changes to the original submission.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** Representation.pdf - <https://oc2connect.gnlp.org.uk/a/4h3>

23914

Object

**Policy 0307/0327, 0307/0327 Policy****Respondent:** Professor John Malcolm Wagstaff [19965]**Summary:**

Soundness. The Plan is full of pious statements but weak on implementation. For example, Section 3, 134: 'High quality new homes will be built to meet the growing and changing needs of Greater Norwich'. 'High quality' does not appear to be defined and no indication given of how compliance will be enforced. The provision of water will become a major issue in this area of 'serious water stress'. The water authority and Natural England seem complacent about this, but the creation of sufficient dwellings for >463,000 will put an enormous strain on available sources. Water availability should be considered to be a major >constraint on further growth.

Duty to Cooperate. I referent to the section on Cringleford. I was the lead author for the Cringleford Neighbourhood Development Plan and subsequently chairman of the parish council. From my perspective, the assessments of the number of dwellings deliverable in the parish is a false reading of the available evidence and the history of housing development in the parish since 2006/07. The Neighbourhood Development Plan fixed the number of new dwellings for the whole of the development area at a maximum of 1,300. This figure governed the number of dwellings allowed to the applicants for planning permission, initially Land Fund/Big Sky and Barratts Homes/David Wilson Homes. Barratts originally applied for 800 dwellings for the whole of site GNLP0307 but were restricted to 650, on a reduced site. That would imply that they could ask for 150 more dwellings at some future date. 'The promoters of the site have submitted representations suggesting that the uplift figure ... should be larger.... further discussions with Development Management colleagues' produced a figure of 410 dwellings. As far as I am aware, Cringleford Parish Council was not consulted.

**Change suggested by respondent:**

More attention should given to the actual practicalities of turning statements of vision and hope into sound reality. How will hopes be turned into real results. A few definitions (Eg. 'sustainable'; 'high quality') might help.

The Cringleford Neighbourhood Development Plan should be re-visited and read more from the perspective of parishioners who, by and large, have not opposed housing development in the area, provided that it was discussed with them through the parish council and the numbers are 'reasonable'. I find it unacceptable that an uplift in numbers can be proposed by the site proposers and agreed with development management colleagues, but not discussed with the parish. Such an approach is likely to incite opposition.

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23641

Object

**CC7, CC7 Policy****Respondent:** Waller Planning (Mr Tim Waller, Director) [19922]**Summary:**

Norwich River Ltd support the proposed allocation of this land. However, they consider that the policy needs to be amended in order to account for the cost of repairing and converting the listed buildings, which are on the Council's "at risk" register. New housing within the site would be enabling development, and there is a need for flexibility with regard to planning obligations and the range of uses provided, to ensure development would be financially viable. The policy also needs to acknowledge the Council's role in allowing riverside access.

**Change suggested by respondent:**

10. Two additional numbered points should be added to the policy, to read as follows:

- "New development on the site will be required to fund the repair and conversion of the listed buildings. The cost of these works may lead to a need for a reduction in the provision of affordable housing and / or other planning obligations, and flexibility in the mix of uses to be provided within the site. This matter will be considered through a financial viability assessment, to be provided with a planning application, and independently assessed by the Council's own independent consultant. In assessing a planning application, the Council will place the greatest importance on the repair and future security of the listed buildings."
- "The Council will work co-operatively with the developer of the site to ensure the policy's requirements relating to riverside access can be delivered."

**Legally** Yes  
**compliant:**

**Sound:** No

**Comply with** Yes  
**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** None

24261

Object

**Policy 1 The Sustainable Growth Strategy, Policy 1 - The Sustainable Growth Strategy****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

In summary, RSL objects to Policy 1 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 and delivery of affordable housing to meet local needs 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 as well as flexibility. Such an approach will also 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 highly-sustainable settlements elsewhere within the plan area.

See attachment for full representation (section 2)

**Change suggested by respondent:**

Please see attachment for full representation (section 2)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
 Site Delivery Statement - Long Stratton HELAA Ref GNLP4034 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cc>  
 Site Delivery Statement - Long Stratton HELAA Ref GNLP4033 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cd>  
 Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf - <https://oc2connect.gnlp.org.uk/a/4cw>

24262

Object

**Policy 7.2 The Main Towns, Policy 7.2 The Main Towns****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

RSL objects to Policy 7.2 as it apportions no additional growth to Long Stratton. This is unjustified as it is inconsistent with the approach taken to other locations in Greater Norwich with similar characteristics (e.g. Wymondham) where the GNLP has made new allocations. Furthermore, this choice has not been informed by a review of the JCS approach to Long Stratton to ensure that it remains justified and effective in light of the most up-to-date evidence and the considerable delays and challenges encountered to date with delivering the LSAAP's strategic allocation. Specific deliverable allocations should be made at Long Stratton to enable the settlement to grow sustainably in the short and medium term and contribute to meeting the need for new housing across Greater Norwich.

See attachment for full representation (section 3)

**Change suggested by respondent:**

See attachment for full representation (section 3)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
 Site Delivery Statement - Long Stratton HELAA Ref GNLP4034 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cc>  
 Site Delivery Statement - Long Stratton HELAA Ref GNLP4033 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cd>  
 Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf - <https://oc2connect.gnlp.org.uk/a/4cw>

24263

Object

**Policy 7.4 Village Clusters, Policy 7.4 Village Clusters****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

RSL objects to Policy 7.4 as the current approach in the GNLP regarding the Village Clusters would not lead to a sustainable pattern of growth and would undermine the Plan's stated spatial strategy in Policy 1 to distribute growth according to the settlement hierarchy. Rather than directing significant growth to rural villages, the GNLP should allocate more land at the Main Towns at sites that have been judged to be both suitable and deliverable.

See attachment for full representation (section 4)

**Change suggested by respondent:**

See attachment for full representation (section 4)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
Site Delivery Statement - Long Stratton HELAA Ref GNLP4034 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cc>  
Site Delivery Statement - Long Stratton HELAA Ref GNLP4033 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cd>  
Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf - <https://oc2connect.gnlp.org.uk/a/4cw>



24264

Object

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**Long Stratton, Settlement Map****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

In respect of Long Stratton, RSL wish to object to the fact that no allocations are proposed within the Part 2 Sites Plan for the settlement. The Part 2 Sites Plan sets out the rationale for this approach but does not add any further explanation to that already provided the Part 1 Plan. Hence RSL's reasoning for its objection to this approach is set out with reference to our representations on the Part 1 Plan.

See attachment for full representation (section 6.1)

**Change suggested by respondent:**

See attachment for full representation (section 6.1)

**Legally compliant:** No

**Sound:** No

**Comply with:** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
Site Delivery Statement - Long Stratton HELAA Ref GNLP4034 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cc>  
Site Delivery Statement - Long Stratton HELAA Ref GNLP4033 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cd>  
Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf - <https://oc2connect.gnlp.org.uk/a/4cw>

24542

Object

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**Site Assessment Booklets and Studies, Sustainability Appraisal Report****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

RSL considers the spatial strategy of the GNLp to be unsound for want of justification as it has not been underpinned by a sufficiently robust SA process. Reasonable alternatives to the preferred spatial strategy have not been adequately appraised in the same detail or on the same basis.

See attachment for full representation (section 5)

**Change suggested by respondent:**

See attachment for full representation (section 5)

**Legally** No

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLp Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
Site Delivery Statement - Long Stratton HELAA Ref GNLp4034 FINAL.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cc>  
Site Delivery Statement - Long Stratton HELAA Ref GNLp4033 FINAL.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cd>  
Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cw>

24543

Object

**Utilities, 0360/3053/R10 Policy****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

RSL considers the ENSRA allocation to be unsound for want of compliance with national policy, justification and effectiveness. It is very unlikely that this site will deliver even close the anticipated quantum of development within the plan period thereby leaving a considerable hole in the GNLP's strategy. The ENSRA should be identified as a longer-term growth aspiration that will start to yield dwellings beyond 2038 and alternative suitable sites should be allocated to make up the shortfall.

See attachment for full representation (sections 6.3 - 6.8)

**Change suggested by respondent:**

See attachment for full representation (sections 6.3 - 6.8)

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
Site Delivery Statement - Long Stratton HELAA Ref GNLP4034 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cc>  
Site Delivery Statement - Long Stratton HELAA Ref GNLP4033 FINAL.pdf - <https://oc2connect.gnlp.org.uk/a/4cd>  
Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf - <https://oc2connect.gnlp.org.uk/a/4cw>

24544

Object

**Costessey Contingency Site, 0581 2043 Policy****Respondent:** Rosconn Group (Ben Ward, Senior Planning Manager) [19994]**Summary:**

RSL considers that more deliverable contingency sites should be identified in the GNLP to offset the risk of under-delivery and to provide the flexibility to respond to changing circumstances. For the reasons discussed above, provision of a reserve site at Costessey at the scale proposed would not perform this function.

See attachment for full representation (sections 6.9 - 6.12)

**Change suggested by respondent:**

See attachment for full representation (sections 6.9 - 6.12)

**Legally** No

**compliant:**

**Sound:** No

**Comply with** Not specified

**duty:**

**Appear exam:** Appearance at the examination

**Attachments:** GNLP Regulation 19 Representations FINAL - BW - 22-03-21.pdf - <https://oc2connect.gnlp.org.uk/a/4cb>  
 Site Delivery Statement - Long Stratton HELAA Ref GNLP4034 FINAL.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cc>  
 Site Delivery Statement - Long Stratton HELAA Ref GNLP4033 FINAL.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cd>  
 Appendix 1 - Preliminary Transport Review Long Stratton, Norfolk Final V1.1.pdf -  
<https://oc2connect.gnlp.org.uk/a/4cw>

23722

Object

**Policy 0188, 0188 Policy****Respondent:** Mr James Watts [14055]**Summary:**

The site has significant drainage issues as evidenced by the large body of water remaining more than a week after a moderate snowfall had thawed in February 2021. The site deprives residents of Norwich Road facing the proposed development of their remaining landscape view, having already lost this in another direction with the development of Barn Piece in 2017. These views have been enjoyed since 1958, over 60 years, and the loss is likely to affect the value of the existing properties. The site also requires careful biodiversity assessment - nearby wood and site hosts species including owls and sparrowhawks.

**Change suggested by respondent:**

- Inhabitants of facing properties on Norwich Road have been uniquely affected versus the remainder of the village by the inclusion of 19 properties adjacent at Barn Piece in recent years, and now stand to be uniquely affected again by the inclusion of the planned 12+ properties facing the existing properties. These views have been enjoyed by the residents of the houses opposite since 1958 and further incursion into privacy is likely to impact residents enjoyment of their properties significantly. This is not a proportionate allocation of impact.
- A full biodiversity impact needs to be carried out, taking account of the presence of birds of prey on the site and its immediate woodland border.
- Drainage issues, including recurring sustained pooling of water in the section of the site/field bordering the hedgerow on Norwich Road, need to be remediated by SUDS or similar following further careful analysis.
- Access of any development needs to be via Honeycombe Road - to avoid further congestion on Norwich Road, and to avoid further inconvenience to existing Norwich Road properties already using a busy road and which have adapted in recent years to additional traffic joining from Barn Piece.
- Pedestrian access and paving should include construction of a Pelican crossing to enable safe passage across the Norwich Road roundabout to Mill Road.
- Following the existing example of Barn Piece, hedgerows should be retained and the existing access route to the field from Honeycombe Road adapted and used, minimising biodiversity and landscaping impact.
- To restrict impact on existing properties views further, housing should be one-storey, set back from the sides of the field to a more central location, and be built facing away from existing properties towards Honeycombe Road.
- Following the existing example of Barn Piece, there should be no street lighting, helping retain the existing dark skies enjoyed by current residents.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** IMG\_161348818922F.jpg - <https://oc2connect.gnlp.org.uk/a/46s>  
IMG\_161348821019F.jpg - <https://oc2connect.gnlp.org.uk/a/46t>  
IMG\_161392265990F.jpg - <https://oc2connect.gnlp.org.uk/a/463>  
IMG\_161366753519F.jpg - <https://oc2connect.gnlp.org.uk/a/464>

23553

Object

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**Policy 7.2 The Main Towns, 346****Respondent:** Ms Rosamund Weatherall [19905]**Summary:**

The original and agreed plan for Aylsham was for 300 homes on one site, even though the infrastructure of Aylsham is already at breaking point. This had been agreed and was overridden with Broadland imposing a plan for 550 homes on 2 sites. This plan was not presented for consultation to the inhabitants of Aylsham or the Town Council and is therefore not legal.

**Change suggested by respondent:**

Return to the original plan for 300 homes. Aylsham has already accommodated 550 houses in the last 2 years with other smaller developments in the town. This is not a 'NIMBY' objection. Aylsham cannot sustain this level of growth. It is fundamentally a small town on a small medieval footprint with poor road access at its centre. The continual housing is destroying its character. Most has not respected the historic nature of the town, neither does it respect the social and structural needs of the inhabitants. Each development, in every decade, has been 'bolted' on the side with no decent roads or cycle access. There is a desperate need for schools, sixth form, doctors, nurseries, care homes, parking, more buses, water supply and sewerage, even before these extra homes are built!

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23554

Object

**Aylsham, 350****Respondent:** Ms Rosamund Weatherall [19905]**Summary:**

The centre of Aylsham is built on a medieval plan - town centre roads are narrow. The town was cut in 2 by the closure of Red Lion Street such that buses could not service one half of the town with chaos caused by cars navigating each half via small roads

Parking is currently inadequate as is public transport. This is a rural town and most people are very reliant on cars.

The A140 has become much busier - more houses = more commuters.

Services are not adequate! Schools, Doctors, and social services are desperately in need of improvement.

**Change suggested by respondent:**

Aylsham cannot cope with the 550 houses imposed by the latest proposal. It is an illegal decision and is doing yet more to ruin the character of the town. It is lazy planning, an easy option without addressing the fundamental issues created by continual development in the town - transport and the accommodation of more cars is only one aspect. The allocation for these extra houses should be spread around the smaller villages - supporting the rural economy. Some move should be made to limit the impact of second homes and holiday homes in North Norfolk and Broadland which seriously affects access to local housing the community.

Aylsham has had more than its fair share of new housing in the last 5 years.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23555

Object

**Aylsham, 352****Respondent:** Ms Rosamund Weatherall [19905]**Summary:**

Under Reg. 18 300 houses were allocated to be built one site - after consultation. Under Reg. 19 an extra 250 houses were added - 550 houses on 2 sites which was not put out for consultation and agreed - it is therefore illegal.

Schools are already stretched and more capacity is needed now, not after building more homes. Retirement care is already critical due to the high numbers of retired people in Aylsham. Building more houses will add to the issue.

The A140 has become much busier more houses = more commuting = higher carbon imprint.

**Change suggested by respondent:**

Do not build the extra 300 houses - especially without solving the major concerns on infrastructure - roads, schools, elderly care, water supply, sewerage management BEFORE further developments are even considered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23556

Support

**Aylsham, 353****Respondent:** Ms Rosamund Weatherall [19905]**Summary:**

I support Anglian water improving water treatment -but because it is needed now not for future development. This has to be addressed before and not during development. There was an issue with the Willow Park (Persimmon) development, and this was never adequately resolved.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23459

Object

**Policy 0596R, 0596R Policy****Respondent:** Mr Edward Welfare [19875]



**Summary:**

GNLP0596R Regulation 19 development of land between Buxton Road and Norwich Road, Aylsham

I write regarding the above proposed development.

Firstly, I have to express huge disappointment and concern over the lack of public consultation in respect of this development of significant impact on Aylsham. In fact it is suggested that pushing this as a fait accompli under Regulation 19 is not sound and possibly not even legal without public consultation. In any event, it is a travesty not to involve the people of the town and community who are directly affected.

As a longstanding local resident, the development in question has always been expected. However, I have to question the whole issue of the timescales and the apparent complete lack of forethought in terms of infrastructure and time for facilities to be developed alongside the substantial increase in population. What about open spaces, pavements and walkways, black and grey drainage, additional shopping, doctors and dentists, emergency services and policing, public transport, litter and environmental management, support for local farmers and landowners for crop damage and livestock injury/loss, public footpath management, road and parking capacity and civic administration to name but a few? It feels like this is just expected to be sorted out afterwards. I can tell you now that these example issues are already causing serious problems with the major additions to population and traffic in recent years. You try turning right out of the top of Buxton Road onto Norwich Road on a Saturday morning when the traffic is queued waiting to get into the Tesco car park .

More specifically, Buxton Road cannot safely cope with the anticipated additional pedestrian journeys. For much of its length, there is no pavement and below what verges might be used, there are mains water and gas supply pipes. As for the narrow entrance and bend, the pavement is so narrow that a pushchair/buggy is too wide and those pushing young children or elderly and infirm in wheelchairs are forced to walk in the road on a dangerous bend. In fact, I doubt if the width meets the definition of a pavement.

Delivery vans and visiting trades vehicles show scant regard for the 20mph speed limit. Larger delivery lorries and refuse collection vehicles regularly cause delays and residents' driveways and existing verges are already being misused and eroded.

**Change suggested by respondent:**

The most practical change to the plans that I would like to see is the area near to the Buxton Road end of the development being redrawn to form a cul-de-sac of say, 12 to 15 dwellings actually facing and connecting to Buxton Road. This should be laid out and constructed so that there is no cycle or footpath access to Buxton Road. In other words, the rears of these properties should form a barrier to the rest of the development and all foot and traffic movement should be to the Norwich Road end. (The current illustrated emergency access will be of limited value given the nature of the narrow entrance and bend at the north west end of Buxton Road.)

This suggestion almost seems to contradict some of my earlier comments. However, although I would prefer no impact, I believe that Buxton Road and the additional roads, Repton and Soame Closes and Lancaster Gardens, could cope with the additional 20 or so residents' vehicles and pedestrian traffic that would be created. If this was supplemented with traffic calming measures such as speed ramps or tables and additional speed limit signs it would avoid completely changing the character of the Road.

As for the wider development, taking it with the other major development plans for the town, we have to have a much more comprehensive and detailed plan in place before we start. So for example, when the Norwich Road has been widened, what is the impact further up on business and residential properties nearer the town centre? When all the extra traffic gets to the entrance to the Market Place, where is it going to go? All you do is move the bottleneck. And where is another supermarket going to go (not forgetting its parking and access needs). (If you want to see how not to do it, look at the Willow Park estate.)

This vision of our wonderful town needs to be produced in conjunction with townfolk and their elected representatives and needs to be at a very advanced stage before any more ground is broken. I firmly believe that it is high time to stop and think about just where this is going because right now it is out of control. It seems like people in Norwich are going through the motions of finding the land, finding a developer, getting some plans drawn up, tweak the surrounding roads and then abdicating any responsibility for the ensuing stack of issues and fallout. It all becomes someone else's problems and that, quite simply, is not good enough. So please, start thinking about the bigger picture and most importantly, work with the people who have to live with the changes foisted upon them long after your involvement has ceased.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24133

Object

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**Aylsham, Settlement Map****Respondent:** Sam Weller [19975]**Summary:**

Reference the proposals for Aylsham... you will kill this market town which, frankly, has already undergone massive change without any thought for its sense of community and far less for the abilities of its hard pressed essential services. New housing and new blood is welcome but Aylsham has now played more than its part. We have lived in the town for more than 35 years... but now we are seriously considering a move.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Written Representation

**Attachments:** None

24086

Object

**Aylsham, Settlement Map****Respondent:** Westmere Homes [16964]**Agent:** Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]**Petition:** 2 petitioners**Summary:**

The Sustainability Appraisal process is flawed as per our accompanying representation. There are errors in the site assessment process and a proposal submitted to officers concerning the delivery of a 150-dwelling scheme on our client's site has been omitted from consideration as a reasonable alternative.

In respect of soundness the consequences of the flaws in the site assessment process, further expanded on in our response, render the plan unsound on the basis that it is not justified, effective or consistent with national policy.

**Change suggested by respondent:**

Review and updating of the Site Assessment paper and process to account for the updated information presented in respect of our client's site at North East Aylsham.

Review and updating of the Sustainability Appraisal for the same, including our client's revised / alternative proposal for a 150 dwelling scheme at the site.

Allocation of part / whole of our client's site to ensure sufficient growth is planned for at Aylsham and that the positive opportunity for sustainable development at the town can be secured.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** Appraisal Summary Note - <https://oc2connect.gnlp.org.uk/a/493>  
Enclosure 2 Amenities Plan - <https://oc2connect.gnlp.org.uk/a/494>  
Rep - <https://oc2connect.gnlp.org.uk/a/495>

23532

Object

**Great Witchingham, Settlement Map****Respondent:** WESTON HALL ESTATE LIMITED [19896]**Agent:** Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]**Summary:**

The Policy Map for Lenwade/Great Witchingham provides two settlement boundaries for one village. The two boundaries exclude existing properties along Norwich Road/Fakenham Road, so that they lie outside of the settlement boundary but they form part of the village. The settlement boundary should be extended to include all the existing built up area of the village and land at Weston Hall, Weston Longville (GNLP0553) to promote sustainable development in rural areas (78, The Framework).

**Change suggested by respondent:**

To be consistent with national policy, planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services (78, The Framework). This submission is accompanied by a masterplan, which shows that land at Weston Hall, Weston Longville (GNLP0553) can deliver up to 85 new homes to meet local needs alongside two new community buildings.

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities (78, The Framework). Lenwade is the main service centre of the Great Witchingham, Lenwade, Weston Longville, Attlebridge, Little Witchingham and Morton-on-the-Hill village cluster.

Currently, there is only one allocation for 20 new homes in Lenwade, which is not consistent with national policy where it states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services (78, The Framework). The allocation of land at at Weston Hall, Weston Longville (GNLP0553) (as shown on the masterplan) would promote sustainable development in Lenwade by locating housing where it will enhance the vitality of local services. In addition, identifying Lenwade as a village for growth will support the communities of the other villages within the cluster. An allocation of up to 85 new homes is likely to unlock the local school's capacity issues.

A new allocation GNLP0553 for housing, consistent with the attached masterplan, should be included in the plan within an extended settlement boundary. Please see below the proposed allocation policy.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Appearance at the examination

**Attachments:** 19336-SBR-ZZ-XX-DR-A-80001 rev2\_compressed.pdf - <https://oc2connect.gnlp.org.uk/a/44j>  
 19336-SBR-ZZ-XX-DR-A-80002 rev2\_compressed (1).pdf - <https://oc2connect.gnlp.org.uk/a/44k>  
 210226 Layout and character sheet.pdf - <https://oc2connect.gnlp.org.uk/a/44z>

23298

Object

**Policy 0605, 0605 Policy****Respondent:** Mrs Emily White [19816]**Summary:**

Aubrey rix and stringers lane is already congested with traffic and I fear for the children's safety that live in the close, at current we aren't allowed to have gates or fences around our front garden and I'd hate for my kids to be subject to an accident due to it being unsafe!!

**Change suggested by respondent:**

Better access needs to be gained! Stringers lane and Aubrey rix really isn't and ideal gain on entry!! It's already unsafe!!

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23575

Object

**What is the Local Plan?, 1****Respondent:** Mr Tommy Wilkinson [19843]**Summary:**

- Unsupported 'confidence in deliverability' of any development in Aylsham under Reg18 by residents, local businesses or Town council making this legally non-compliant and unsound.
- Non-consulted 83% increase in the number of homes between Reg18\Reg19 making this non-compliant
- Increase of development sites from one to two without consultation, making this non-compliant.
- No consultation on Reg19 regarding all aspects of the town's infrastructure making this non-compliant and unsound
- Failure to comply with LPA'S SCI
- Failure to comply with National Planning Policy Framework (Lack of engagement & collaboration)
- Failure to comply with the Planning & Compulsory Purchase Act 2004 (under duty to co-operate)

**Change suggested by respondent:**

- Withdrawal of the second development site and consideration of other sites within the GNLP area as well as use of potential 'Brown field' sites.
- A Publicly negotiated, announced and agreed set timetable and collaboration plan to involve the Aylsham Town Council, public community & local businesses on all future development plan negotiation.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23576

Object

**What is the Local Plan?, 2****Respondent:** Mr Tommy Wilkinson [19843]**Summary:**

- No community or council support due to lack of consultation under the NPPF. Only support from the developer is shown, making this non-compliant and unsound.
- Reg18 gave notice to schools' development within Aylsham. Reg19 has no provision for plans showing timescales or size of facility to gauge feasibility to the increased student capacities, making this unsound.
- Reg18 gave vent to issues regarding meeting of governmental carbon neutral targets. The second development site under Reg19 will severely impact making this non-compliant and unsound
- Lack of consideration to Health and Community Care makes this unsound
- No consideration to the Aylsham Settlement Boundary

**Change suggested by respondent:**

- Compliance to the NPPF
- Planned school development to be at the forefront of any development commencement
- Infrastructure negotiation for internal town travel to reduce vehicular travel.
- Planned development of Medical, Health, Wellbeing and Social care facilities
- Planned development strategy for:
  - a) housing (including affordable housing), employment, retail, leisure and other commercial development;
  - (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

**Legally No  
compliant:**

**Sound: No**

**Comply with No  
duty:**

**Appear exam:** Written Representation

**Attachments:** None

23577

Object

**What is the Local Plan?, 3****Respondent:** Mr Tommy Wilkinson [19843]**Summary:****Legal Compliance:**

- The GNLP gave no consideration to the Aylsham community or Town Council when adding 83% to the housing development making this non-compliant

**Sound:**

-Lack of remit to waste&water supply services in the NPPF(Planning Policy for waste) making this unsound as a development for future sustainability.

-Lack of consideration to the governmental Carbon-neutral targets through offering an increased traffic issue of 800 vehicles.

**Co-operate:**

-Once gain the GNLP's lack of early and continual collaboration with the community and stakeholder bodies in the town to changes made to the Regulation makes this non-compliant and unsound.

**Change suggested by respondent:**

-A review of water supply and waste retrieval to be commissioned to Anglian Water

-Planned and well informed meeting schedule to include the Town Council, town stakeholder bodies and the community in general to all future development negotiation

-Comprehensive review to the towns' infrastructure regarding; Road networks; Pedestrian access, Vehicle parking; Schooling; Conservation of 'Historical' and 'Unique' environment; Review of Wellbeing and Social care facilities; Review and plan for Medical and Health services; Review of environmental and conservation area covered by the River Bure which runs from the North of the conservation area to the South-east of the town.

**Legally No  
compliant:**

**Sound: No**

**Comply with No  
duty:**

**Appear exam:** Written Representation

**Attachments:** None



23578

Support

**What is the Local Plan?, 4****Respondent:** Mr Tommy Wilkinson [19843]**Summary:**

-My support to this is somewhat shaky here, as there is little to give confidence in Reg19 to show how the GNLP will offer this plan for adoption under the government's white paper of August 2020 'Planning for the Future'.

-Reg19 has refuted the suggestions of Re18 by adding 83% more dwellings and an additional development site without full consultation or collaboration.

-Reg19 has not expanded on, or developed plans suggested on educational, health & social care, infrastructure, medical or service provision as suggested in Reg18.

These aspects will need addressing to gain my full support.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23579

Object

**Foreword****Respondent:** Mr Tommy Wilkinson [19843]**Summary:**

\*Legal compliance not met in the following through poor Community Consultation; Engagement & Collaboration; Constructive engagement over Strategic matters during preparation of the plan :

- Statement of Community Involvement(SCI)
- 1.6:Para155 National Planning Policy Framework
- Section33A: Planning & Compulsory Purchase Act

\*The Soundness is compromised by detail inaccuracies regarding Aylsham, its heritage and historical environment and lack of positive & accurate growth development detail other than for dwellings :

- Education centres -Schools
- Medical & health provision
- Social Care and Wellbeing provision
- Environmental issue with regard to carbon footprint targets
- Transport infrastructure
- Sewage and Water supply
- Telecommunications structure to include Broadband facility

**Change suggested by respondent:**

\*Full compliance to notification & engagement; co-operation & collaboration; throughout all negotiations with regard to expansion of the settlement boundary through excessive development.

\*Clear and positive consideration of the Settlement Boundary to ensure preservation and conservation of :

- the surrounding countryside;
- internal uniqueness and 'individuality' of the town
- the town's historical and important sites and roadways

\*Ensure full exploration of all suitable sites within the Settlement Boundary to include Brown Field and In-fill sites.

\*Show detail for retail and commercial development to enhance a 'Strong' and 'Greener' economic recovery and provision for the future.

\*Show adherence to and provision for methods to meet the Economic Objective; Social Objective and Environment Objective of the NPPF Section2 Achieving Sustainable Objectives

**Legally** No  
**compliant:**

**Sound:** No

**Comply with** No  
**duty:**

**Appear exam:** Written Representation

**Attachments:** None

23686

Object

**Aylsham, Settlement Map****Respondent:** Mr Bob Wilson [19932]**Summary:**

I understand that under this part of the process you are looking for comments on the soundness and legal compliance of this stage. I believe that the proposal for Aylsham is not legally compliant because Regulation 18 stated that Aylsham would have ONE site that was put forward for consultation but Regulation 19, and the map clearly shows this, states that there will be TWO sites which has not been consulted upon. I understand there has been no consultation with the Town Council or local residents on such a major development which seems like a circumvention of what is legal and morally correct.

In addition, I believe the proposals are not sound as Regulation 19 failed to consider the impact of 2 sites on the infrastructure needs of the town which is clearly one of the key elements of any project such as this one.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23255

Support

**Taverham, Settlement Map****Respondent:** Mr John Wilson [17114]**Summary:**

As a resident of Taverham Road Taverham, after reviewing the plan, we in XXX Taverham Road support the plan as set presently. Appreciate that GNLP 4040 has not been supported and is not included, we believe that the proposal was steps too far.

Furthermore it's noted that proposals for any major development on south side are not supported by either residents, nor Taverham Parish Council.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** Not specified

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23842

Object

**Delivery, Delivery Statement****Respondent:** Mr Adam Wolton [19530]**Summary:**

The GNLP does not meet the NPPF requirement for sustainable development. The GNLP is not compliant with the legal requirement to mitigate and adapt to climate change in Section 19 (1A) of the Planning and Compulsory Purchase Act 2004

**Change suggested by respondent:**

A policy of concentrating development within the Norwich urban area should be pursued to enable the plan to be sustainable.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Written Representation

**Attachments:** None

23410

Object

**Easton and Honingham, 3.40****Respondent:** Easton Parish Council (Mr Francis Woodcock, Parish Clerk) [19782]**Summary:**

The original housing numbers are not deliverable due to about 90 of these houses are allocated on land that is deemed contaminated by the department for environment food and rural affairs. They are also looking to mislead the inspector as to the deliverability of 90 homes on an unallocated section of EAS1 next to the Easton Gym club on Bawburgh Road. Currently a planning application under South Norfolk 2021/0132 and is to be determined by Norfolk County Council FUL/2020/0110.

**Change suggested by respondent:**

The removal of the extra housing allocation to the East of the Easton Gym. The separation of Easton and Honingham as two separate villages and full consideration of the Easton Neighbourhood Plan Policy 2 needs to be considered.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23464

Object

**Policy 0596R, 0596R Policy****Respondent:** Mrs Charlotte Wootten [18596]**Summary:**

I am writing to express my anger at the cavalier way in which the latest version of the Greater Norwich Local Plan has been imposed upon Aylsham.

We were extremely shocked to find that Aylsham had been allocated a further 250 houses in addition to the 300 which had already been approved under Regulation 18. This addition has been imposed without discussion or any thought to the local infrastructure or character of the Town.

Many of us took part in the consultation on the local plan in the Town during 2018/9. As a result of that consultation additional one additional site for housing was, albeit reluctantly, agreed. Our infrastructure is already struggling to cope, our schools are already full, the water and sewage systems are inadequate to cope at the moment and our roads are clogged with the additional cars that previous development in the Town has engendered. It seems that this new allocation has been rushed through GNLP without thought to sound principles of local planning and I believe that the legality and soundness of the new GNLP should therefore be called into question.

I think I am right in thinking that even our elected representatives on Broadland Council were not consulted about the increased allocation. This is not democracy in action, it is more like institutionalised thuggery. It is being imposed on the Town against its wishes and with absolutely no thought to how it might impact Aylsham.

We should all protest in the strongest possible terms.

**Change suggested by respondent:**

-

**Legally compliant:** No

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23935

Object

**Wroxham, Settlement Map****Respondent:** Wroxham Football Club (Mr Chris Green, LP Contact) [13297]**Summary:**

In regard to GNLP 0041, the officers say that given the site is already developed (and has been added to since the Reg 18 stage of the recommendations with a phone mast etc) "there is a case for its inclusion in the settlement limit and it is identified for further assessment for this....will be addressed for the Regulation 19 version of the plan." The site is already included in the Wroxham Conservation area which is noted in the Wroxham Neighbourhood Plan. We feel there is a strong case for its inclusion in this plan. This has NOT been done nor has the adopted Broadland DC Playing Pitch Strategy with regard to relocation been fully considered in our opinion.

Another club in our league in Norfolk (Gorleston FC) has already demonstrated there are funds available from the Football Foundation for a similar relocation, also Long Melford FC in Suffolk for a new pavilion. Both obtained over £600k from the FF; so the claim that substantial investment is required is accurate but those funds are available from the football funding body for the right types of application. Given the potential for a community football hub within the Growth triangle we believe there is a strong viable case for another Step 5 club within the National football pyramid to receive funding - GIVE US A CHANCE!

We have the support of Sport England/Norfolk FA and Wroxham Parish Council who stated the current site would be ideal for a retirement location as identified as being needed in the Neighbourhood Plan.

There doesn't seem to have been much co-operation with other authorities eg North Norfolk who have included sites for over 300 homes at Hoveton/Stalham/Ludham in their Draft Plan which will all need to use the transport infrastructure passing thro' Wroxham, a Key Service Centre. 20-30 additional homes in Wroxham would hardly seem to make much difference. For these reasons, we believe the recommendation not to include GNLP 00041 within the plan is unsound.

With support, the proposed relocation for a much needed centre of football excellence is deliverable.

**Change suggested by respondent:**

Include site GNLP0041 as a reasonable site in the GN Local Plan and incorporate it in the Wroxham settlement limit.

**Legally compliant:** No

**Sound:** No

**Comply with duty:** No

**Appear exam:** Appearance at the examination

**Attachments:** None

23915

Object

**Policy 0354R, 0354R Policy****Respondent:** Wymondham Heritage Society (Mrs Janis Raynsford, Secretary) [19193]

**Summary:**

We object to the inclusion of this site in the GNLP. Despite substantial development pressure in the A11 corridor, planning policies have thus far helped protect the separate identities of Wymondham. Policy GNLP0354R would harm the rural gateway to Wymondham from the west meaning the Grade 1 Wymondham Abbey would only be seen obliquely through housing. The land is elevated and further building here would effectively destroy the current views. Any housing would also compromise the exceptional Grade 1 listed Cavick House and ancillary buildings which create one of the most significant groups of historic buildings in the Conservation Area. The site lies on the outskirts of the designated river valley landscape: there are County Wildlife Sites at nearby Wymondham Abbey Meadows and Tiffey Meadows south and north, and is outside the existing settlement boundary. The proposed building site is encompassed by narrow lanes so housing would severely urbanise the historic western approach to the Abbey and compromise the rural character of the landscape in general. There would be a loss of habitat for wildlife, an increase in pollution and light pollution and is popular with walkers, cyclists, runners etc. Development Management 4.5 Landscape Character and River Valleys: "All development should respect, conserve and where possible enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused". We that this promise will be upheld.

**Change suggested by respondent:**

We believe that Policy GNLP0354R is unsound and should be removed from the draft Greater Norwich Local Plan.

It is claimed that this site has been selected because it has "good access to facilities" and there are at least two references in the GNLP to development on the site:

"relating well to existing form and character of Wymondham, without adversely impacting on views of Wymondham Abbey and that the site can be developed for housing without significant harm to the setting and views of Wymondham Abbey"

and

"It is for this reason that the site should be identified as a preferred site for housing in the draft Local Plan".

We believe neither of these statements if justified, both are unsound and, unless removed from the Greater Norwich Local Plan will lead to the complete urbanisation of a much loved rural aspect of Wymondham.

It is to be hoped that the additional housing allocation of 300 houses will not be implemented in the future on this extremely sensitive site.

**Legally** Yes

**compliant:**

**Sound:** No

**Comply with** Yes

**duty:**

**Appear exam:** Written Representation

**Attachments:** None

## 23707

## Object

**Introduction, 162**

**Respondent:** Mr Christopher Yardley [16025]

**Summary:**

Comments on the failure to adequately address sustainability principles in the GNLP

The joint councils involved in the Greater Norwich Area are currently consulting on the revised local plan. This envisages

significant growth in the population of around 16% between 2018 and 2038. The basis of the development plan has to be supported by 'sustainability principles'. This is one of the key underlying fundamentals which are supposed to guide development policy, yet at the same time, the County Council and other partners such as Anglian Water etc. are only too aware that there are massive water shortage problems in Norfolk, and East Anglia in general and have established a project the Sustainable Water Management Plan for Norfolk. From this evidence and other sources it is apparent that both our surface and ground water resources are being depleted by abstraction and drought issues faster than they can be recharged, and are projected to worsen, and that this is causing us to experience 'poor' quality ground water / surface water due to pollution and increasing concentrations of this due to diminishing volumes.

Clearly, if water is being used faster than it is being replenished then we are going to run short – in fact we already are, seriously so. Technology is not the answer as there are clearly no mechanisms in place to help to reduce demand sufficiently to compensate, and this is not a new problem as this issue has been discussed and known about since the 1990s and nothing has been done which would actually have any meaningful impact on the issues - who would pay and how basically.

There is no indication in the GNLP as to how this situation will be addressed in a measured, quantified, monitored and responsible manner which would indicate that this situation will not worsen, that damage to our health and environment (particularly by the drying out of key wetland habitats due to abstraction and the damage to Protected habitats and species) will not occur as a direct result of the amounts of growth provided for in the GNLP. As such the GNLP does not meet sustainability criteria and would be in contradiction of the Habitats Regulations.

Paragraph 162 of the Sustainable Growth Strategy seeks to promote Norwich as a key growth area to support the development of the national economy. It goes on to say that this will be compatible with 'protecting and enhancing the environment'. In preceding paragraphs it states that both greenfield and brownfield sites will be developed. The aims of the policy are fundamentally in conflict and cannot be reconciled. It is not possible to achieve large scale growth and protect and enhance the environment. The site allocations chosen and the development strategy proposed clearly will urbanise and pollute (air, water, light and noise) what are currently rural areas. It also removes the appeal and attractiveness of rural areas and replaces it with unattractive, unappealing urban sprawl. This is not consistent with protection of the environment and it is not correct to state that it is. The plan therefore fails to demonstrate that it is sustainable in this respect.

The fundamental tenant of sustainability is that it should not damage or harm the environment in a manner which will result in cumulative net adverse impacts. The choice of a largely un-developed rural county to be targeted for large scale development and growth in preference to other areas of the Country which are already developed / damaged, and in need of regeneration / already have unemployment figures which suggest an underemployed workforce is again contrary to sustainability principles.

Similarly the choice of an area of the Country with limited infrastructure and positioned poorly geographically, making transport costs and mileage greater than for other areas is again contrary to good sustainability principles. Other areas of the Country are much better connected, have better existing infrastructure and clearly will have significantly lower adverse environmental impacts from development than those proposed in the GNLP. No sequential test to compare or even consider these issues is contained in the Plan, and therefore it fails the test of sustainability on this account.

The sustainability references need to be considered further. Large scale development as proposed will require responses in the form of new hospitals, schools, medical facilities and personnel, social services, older person's services etc. These needs are referenced but not quantified and planned for within the GNLP and there are no indications where or specifically how they will be provided for although broad references to various sources of funding (none specific) are referred to. To propose large scale migration and development without ensuring that the means to support it are present and will be adequate / appropriately located is again risking an unsustainable community development and contrary to sustainability principles.

Specific comments on site proposals

Site allocation GNLP 0466R / HNF2. The policy in the Broadland District LP states that only those employment uses which have 'significant specific benefit from a use being located near the airport' shall be permitted.

Clearly this is intended as a sustainability reason for the location of and otherwise intrusive and inappropriately located industrial estate which extends the developed area of Norwich approx. 1m further north than currently exists into open and undeveloped greenfield countryside.

However it is noted that this condition is not continued in the GNLP policy for this site and this is clearly an omission which is contrary to sustainability principles as the location of such a development to the north eastern side of Norwich –



adding transport miles to any communication to this location from more or less anywhere else in the County or Country is contrary to such principles.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

23708

Object

**Policy HNF2 0466R, HNF2 0466R Policy**

**Respondent:** Mr Christopher Yardley [16025]

**Summary:**

Specific comments on site proposals

Site allocation GNLP 0466R / HNF2. The policy in the Broadland District LP states that only those employment uses which have 'significant specific benefit from a use being located near the airport' shall be permitted.

Clearly this is intended as a sustainability reason for the location of and otherwise intrusive and inappropriately located industrial estate which extends the developed area of Norwich approx. 1m further north than currently exists into open and undeveloped greenfield countryside.

However it is noted that this condition is not continued in the GNLP policy for this site and this is clearly an omission which is contrary to sustainability principles as the location of such a development to the north eastern side of Norwich – adding transport miles to any communication to this location from more or less anywhere else in the County or Country is contrary to such principles.

**Change suggested by respondent:**

-

**Legally compliant:** Not specified

**Sound:** No

**Comply with duty:** Not specified

**Appear exam:** Not specified

**Attachments:** None

24134

Object

**Policy 0133E, Policy 0133E****Respondent:** Yare Valley Society (Mr John Elbro, Chair) [14909]**Summary:**

If Policy GNLP0133-E were enacted it would damage the existing green infrastructure and increase pressure on the remaining green infrastructure. Such development would not be consistent with the NPPF, is not justified by the Policies in the draft GNLP Strategy, and is not justified taking into account reasonable alternatives.

**Change suggested by respondent:**

For the reasons given, the inclusion of the Policy GNLP0133-E cannot be justified, and should be deleted if the GNLP is to be sound.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24135

Object

**Policy 0133DR, 0133DR Policy****Respondent:** Yare Valley Society (Mr John Elbro, Chair) [14909]**Summary:**

If Policy GNLP0133DR were enacted it would reduce the existing green infrastructure and increase pressure on the remaining green infrastructure of the Valley Corridor. Such development would be contrary to NPPF and to Policies in the draft GNLP Strategy.

**Change suggested by respondent:**

For the reasons given above, the footprint of Policy GNLP0133DR should be returned to that approved in the 2016 Local Plan, and so make the Policy consistent with the NPPF and with the GNLP Strategy.

**Legally compliant:** Yes

**Sound:** No

**Comply with duty:** Yes

**Appear exam:** Written Representation

**Attachments:** None

24190

Object

**Aylsham, Settlement Map****Respondent:** William Young [20052]**Agent:** Mr Jon Jennings [19303]**Petition:** 2 petitioners**Summary:**

These representations have been prepared by Cheffins Planning on behalf of William Young. They relate on to the site reference GNLP0287 which is being promoting a 12.85ha site for approximately 250 dwellings and 2.35ha of public open space for recreation and leisure at land north of Marriots Way, Alysham. These representations provide comments in relation to the assessment of the site made in the HELAA Comparison Table and the Stage 6 – Detailed Assessment of Reasonable Alternative Sites. These representations also need viewed in conjunction with the detailed representations and masterplan submitted in connection with the Regulation 18 consultation.

These representations have also assessed and compared GNLP0287 against those identified for allocation, namely, sites GNLP0311, GNLP0595 and GNLP0260. It is also important to note that this site has more positive scores than any of the sites identified for allocation in the Stage 2 – HELAA comparison table.

It is noted that GNLP0287 has been given an amber score for site access. This is a contradiction of the comments made by Norfolk County Council where they have advised that the site is suitable for development subject to access being via St Michael's Avenue and improvements to Marriotts Way. However, the comments made by Norfolk County Council are incorrect and the main vehicular access will be from the newly constructed housing development to the south of the site, with this access joining the B1145 Cawston Road via a new roundabout. The access road runs along the western site boundary and will therefore have little impact on the amenity of the dwellings within the Willow Park development.

Please refer to continuation sheet

**Change suggested by respondent:**

The are clear inaccuracies in the assessment of this site, in particular with regards to the access arrangements. In addition, there are benefits arising from this site in terms of recreation and health care which have not been considered. Also there is a need for consideration being given to the level of development being apportioned to towns as they have a track record of delivering housing in a timely manner.

**Legally** Yes**compliant:****Sound:** No**Comply with** Yes**duty:****Appear exam:** Appearance at the examination**Attachments:** Question 5 continuation sheet - GNLP0287 Land north of Marriotts Way, Alysham 22.03.21.pdf -<https://oc2connect.gnlp.org.uk/a/4b6>5247 Sketch Site Plan.pdf - <https://oc2connect.gnlp.org.uk/a/4b7>