

NORWICH – SITE SUMMARIES

NORWICH

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	NORWICH - OVERVIEW
TOTAL NUMBER OF REPRESENTATIONS:	163 representations (covering 52 sites)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	<p>GNLP (95 representations) Support: 17 Object: 40 Comment: 38</p> <p>CC (29 representations) Support: 3 Object: 9 Comment: 17</p> <p>R (39 representations) Support: 13 Object: 5 Comment: 21</p>

Summary of main issues relating to Norwich City (not including urban fringe):

GNLP sites

1. Historic England have highlighted an absence of historic context and reference to heritage assets within the wording of a number of site allocation policies. They also raise concern relating to scale, density, grain of proposed developments within the context of the historic environment.
2. Anglian Water welcome the reference to water efficient design within site allocation policies and highlight where this has not been included. In contrast to this several representations highlight that reference to this is not essential as it is covered within strategy policy & should only be included if an alternative standard is expected from a site, in which case more clarity is required relating to the bespoke requirements.
3. Environment Agency highlight the requirement for appropriate design of SuDS for developments within the proximity of a river. They also highlight instances of proposed developments on proposed allocations within flood zones 2 & 3 with recommended approaches to be taken.
4. Broads Authority seek further detail relating to developments making the most of their riverside location, clarification relating to provision of riverside walk/cycleway. They also highlight that the Affordable Housing policy wording needs strengthening in site allocation policies as it is currently ambiguous.
5. A number of objections have been received relating to further proposed development in the Yare Valley and development which would result in the loss of green space.
6. There is some objection to increased provision of student accommodation on the UEA campus.
7. Norfolk Wildlife Trust – expectation for ecological appraisal for all sites in proximity to known wildlife sites, as well as irreplaceable habitats such as ancient woodland, and priority habitats.
8. Sites should include mandatory requirement for developments to include green design features.
9. Approach to Affordable Housing is too broad – it does not fully consider site specific circumstances & viability issues.
10. Considered to be potential for increased delivery in East Norwich Regeneration sites, acknowledgement of significant infrastructure requirements.

Changes to sites advised by landowners/agents:

- **GNLP0409R** – landowner objects to single allocation for this site & does not support the proposed policy. They suggest split allocation (different to existing adopted split allocation)
- **GNLP1061** – Norwich International airport object to the policy approach to their proposed site.
- **GNLP2159** – landowner withdraws support for the proposed residential allocation of the eastern part of the site (84-120 Ber Street and Mariner's Lane Car Park) on the basis that it is no longer available for residential purposes. Land to the west (147-153 Ber Street) remains available, and the current allocation (CC2) for a minimum of 20 dwellings on this part of the site should be carried forward.
- **R10** – The site owner advises that provision of an energy plant on this site is prohibitively expensive in this location & there is no intention from them to bring this aspect of the allocation forward, as such it should be removed from the policy requirement.
- **R31** – The site owner advises that the site area available for allocation is now reduced (can now accommodate approximately 60 homes).
- **R35** – The site owner advises that this site is no longer available for allocation and wish to withdraw it from consideration.

Sites not commented on through the consultation:

Carried Forward Allocations

- Policy R29

Reasonable Alternative Sites

- GNLP0381
- GNLP0570
- GNLP3050

Unreasonable Residential Sites

- GNLP0117
- GNLP0113A
- GNLP0184
- GNLP0248 A&B
- GNLP0453
- GNLP0500
- GNLP1011
- GNLP2077
- GNLP2120
- GNLP2123

Norwich – Preferred Sites

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0068 Land adjacent to the River Wensum and the Premier Inn, Duke Street, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	6
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of public	Support	As a neighbour I support the redevelopment of this effectively scrap land. I would like to see an extension of the riverside walk through the site with a connection to St Georges St.	Support for development of Brownfield site & provision of riverside walk	noted	no change
Historic England	Object	This site is located within the Norwich City Centre Conservation Area. There are a number of listed buildings in the vicinity of the site including Blackfriars Bridge and 52 Colgate, both listed at grade II. Redevelopment of the site therefore has the potential to affect these heritage assets and their settings.	Broadly supportive of principle of development Suggested wording for heritage assets support for riverside walk	Suggested wording relating to Heritage welcomed & to be included in policy wording. Riverside walk support welcomed	Heritage policy wording amended in accordance with representation suggestion No change to riverside walk

		<p>Historic England is broadly supportive of the principle of redevelopment of this site.</p> <p>We welcome the commitment in the policy to an appropriate scale and form of development in bullet point 2.</p> <p>However, there is no mention of the Conservation Area in the policy or supporting text and whilst bullet point 3 mentions the need to conserve and enhance adjoining heritage assets, the Conservation Area is not adjoining (the site lies within it) and other assets are not adjoining but nearby. Therefore, we suggest amending the policy wording to read Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings (including any contribution made to their significance by setting).</p> <p>We welcome the commitment to riverside access for walking and cycling in bullet point 5.</p> <p>We note a desire to increase density at the site but emphasise that it is important that this must not cause a greater degree of harm on the historic environment.</p> <p>Suggested Change: Amend the policy wording to read Conserve and enhance the significance of the City Centre Conservation Area</p>	<p>concern relating to density and potential impact on heritage assets</p>		
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		and nearby listed buildings (including any contribution made to their significance by setting).			
Anglian Water Services Ltd.	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p> <p>There is also a surface water discharge point located within the boundary of the site which should be referred to as part of the site specific requirements.</p>	<p>Welcome water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p> <p>Additional wording required in policy to refer to a surface water discharge point on boundary of site.</p>	<p>Noted. This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p> <p>Surface water discharge point to be referenced in policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.</p> <p>Add reference to surface water discharge point in policy.</p>
Environment Agency (Eastern Region)	Comment	<p>We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>This site allocation lies in present day Flood Zone 2, but once climate change is added to the flood levels, the entire site lies in Flood Zone 3a High</p>	<p>SuDs need to be addressed in policy – in relation to riverside location & provide improvements to habitat.</p> <p>Site located in present day flood zone 2, but climate change zone 3a – this must be reflected in design of development.</p>	<p>Additional information welcomed. Flood resilience mentioned in policy, suggest early engagement with EA in supporting notes</p>	<p>Supporting notes updated to recommend early engagement with EA</p>

		<p>Probability. Therefore the more vulnerable residential development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any new built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage, which may be difficult to achieve, as the entire site is within Future Flood Zone 3a. However we note that there is an extant permission on the site, and that the development has been designed not to impede water flow, and allow flood storage across the ground floor levels.</p>	<p>Recognition of existing permission on site & how this addresses flood issues.</p>		
Broads Authority	Comment	<ul style="list-style-type: none"> • Could it make the most of its riverside location? • Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word 'should' seems 	<p>Ambiguous wording to affordable housing policy.</p>	<p>Comments relating to Affordable housing accepted</p> <p>Riverside walk wording</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p>

		<p>to weaken the requirement. CC4b for example does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</p> <ul style="list-style-type: none"> • Bullet point 5 – so will they provide a river side path? Or maybe do it? Part of the bullet says to do it and then the other says potential future extension – suggest this is clarified. GNLP0401 equivalent bullet points implies the walkway/cycleway will be provided as part of the scheme. Is the scheme expected to provide the walkway/cycleway and to what standard? 	<p>Clarification required relating to riverside walk wording</p> <p>Potential for enhancement to riverside location</p>	<p>strengthened & reference to be made to River Wensum Strategy for standard.</p>	<p>Riverside walk wording amended</p>
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0133-B Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery), Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	4
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 2 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for UEA	Support	<p>On behalf of UEA - Strong support for preferred allocation.</p> <p>The site is entirely deliverable & capable of making a significant contribution towards facilitating the UEA's forecasted student growth, and expansion of its estate, up to 2038.</p> <p>Site area should be revised to match UEA DFS (1.06ha)</p> <p>Principle of development established: Existing allocation R39 & previous outline consent (now lapsed)</p>	<p>Site area & suggested policy wording</p> <p>Historic England Historic Parkland review</p>	<p>Noted,</p> <p>Policy wording and site boundary to be reviewed</p> <p>Await updates from Historic England review</p>	<p>Site boundary revised in accordance with rep, map revised.</p> <p>Reference made to HE historic parks and gardens designation of Earlham Park</p> <p>Policy text revised in accordance with rep.</p>

		<p>Site is deliverable in accordance with NPPF definition: the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site, and is viable (detail provided in rep).</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revision to policy wording.</p> <ul style="list-style-type: none"> • Site area – revise 1.38ha to 1.06ha • Achievement of a locally distinctive high quality, low carbon, energy and water and energy efficient exemplar development of exceptional quality which respects its historic context. 			
Member of public	Object	<p>I object to further building works in an area that was previously accessible as a thoroughfare from the southern fields to the northern fields, passing through the gardens and by the old walled gardens. These building works seem to prevent</p>	<p>Objection to potential loss of public access to areas disuse of the old estate/gardens.</p>	Noted	<p>This is the residue of an existing allocation and previously consented site, the principle of</p>

		public access more and more and will lead to a disuse of the walled gardens and the old estate gardens.			development is accepted. No change.
Historic England	Object	<p>Earlham Hall is listed at Grade II* with the garden walls and dovecote listed at grade II. The whole site lies within the Earlham Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings.</p> <p>We suggest that a more detailed HIA be prepared for the campus as a whole. We note bullet point 2 relating to the need to protect and enhance the significance of heritage assets including Earlham Hall and Earlham Conservation Area. It would be helpful to state that Earlham Hall is listed at Grade II* and that there are other grade II listed buildings/structures.</p> <p>Suggested Change: Reword bullet point 2 to read Development should protect and enhance the significance of the grade II* Earlham Hall and associated Grade II listed buildings and the Earlham Conservation Area (including any contribution made to that significance by setting), through careful design, massing and appropriate open space and landscaping.</p>	<p>Insufficient reference to heritage assets & mitigation/design.</p> <p>Recommend preparation of a more detailed Historic Impact Assessment (HIA)</p>	<p>Need for strengthened heritage asset wording accepted.</p> <p>The UEA has a number of evidence documents endorsed by Norwich City Council. Principle of development accepted due to existing allocation & previous consents on site. HIA requirements not added to policy.</p>	Amend policy wording to recognise importance of heritage assets.

<p>Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>We welcome the reference made to the achievement of a water efficient exemplar development. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Welcome reference to water efficient exemplar development - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.</p>
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0133-C Land north of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House, University of East Anglia) Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for UEA	Support	<p>Strong support for preferred allocation</p> <p>Principle of development established through existing allocation & extant planning consent.</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. (Details/evidence contained within representation)</p>	<p>suggested policy wording</p> <p>Historic England Historic Parkland review</p>	<p>The outcome of Historic England's review was not to designate the parkland – no reference required</p> <p>Affordable housing dealt with in strategy, no longer referenced/duplicated in site specific policies.</p>	Allocate with revisions to policy wording

		<p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revisions to policy wording:</p> <ul style="list-style-type: none"> • Omit: ."and is to provide affordable housing in accordance with policy 5, subject to viability considerations" from bold text. • Omit '<i>locally distinctive</i>' from bullet point 2 • Amend final bullet point to: '<i>Access arrangements to the site will be in accordance with the approved planning permission, unless otherwise agreed with the <u>Local Planning Authority in consultation with the Local Highway Authority</u></i>' 		<p>No benefit to omitting locally distinctive wording</p> <p>Highways access wording accepted</p>	
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Absence of water efficiency wording in policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. No Change</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0133-D Land between Suffolk Walk and Bluebell Road, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	6
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 3 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for UEA	Support	<p>Strong support for the preferred allocation, the site is entirely deliverable, and capable of making a significant contribution towards facilitating the UEA's forecasted student growth, and expansion of its estate, up to 2038.</p> <p>Part of GNLP0133-D (2.85 ha) is allocated in the Adopted Development Plan, as a strategic reserve (Policy R41), and is identified in the 2010 DFS. Policy R41 allocated the site on the basis of it only being released for development following</p>	<p>suggested amendments to policy wording and site area</p> <p>Historic England Historic Parkland review</p>	<p>The outcome of Historic England's review was not to designate the parkland. – no reference required. Site are error accepted – revision required.</p> <p>Amendments to wording of bullet 2 recognised – amendments to be made with</p>	<p>Site boundary revised to reflect the site proposed in DFS 2019</p> <p>Bullet 2 wording revised.</p>

		<p>the development of the Blackdale School site and Earlham Hall site. It should be noted that the Blackdale School site is consented, and part developed, for student accommodation. The Earlham Hall site has been under development, with the remainder of Earlham Hall identified by Area 1 of the DFS (2019). Consequently, GNLP0133-D has now been identified as a preferred allocation due to the principle of development being established by virtue of the existing Adopted Development Plan allocation (R41), and the need arising, as identified within the DFS (2019).</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. (detail provided in representation)</p>		reference to other representations.	
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		<p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revision to policy wording:</p> <ul style="list-style-type: none"> • Site size 3.93ha not 2.74ha • Omit 'locally distinctive' from bullet point 1 • Amend bullet point 2 to read: <i>"Development should take account of its sensitive location adjoining the University Broad, protect the visual setting of the south elevations of "The Prospect" and respect the heritage significance and setting of the listed buildings within this part of the campus, balanced against having regard to Lasdun's original architectural vision which must be a material consideration in its design"</i> 			
Historic England	Object	There are no designated heritage assets within the site boundary but the Earlham Park Conservation lies to the north of the site and the campus includes a number of listed buildings including the grade II* Sainsbury Centre and Norfolk and Suffolk Terraces,	Amend policy wording to reference proximity to heritage assets. Suggested production of a detailed Historic Impact Assessment	HIA not considered necessary, UEA has a suite of documents agreed with Norwich City	Policy wording to be reviewed and amended referncing heritage assets.

		<p>together with a number of other grade II listed buildings. Any development of this site therefore has the potential to impact upon the settings of these designated heritage assets.</p> <p>We suggest that a more detailed HIA be prepared for the campus as a whole. We welcome bullet point 2 regarding the heritage significance and setting of buildings within the campus and also the sensitive location adjacent to the University Broad. Careful design will be needed of any development to ensure the protection and enhancement of nearby heritage assets.</p> <p>Suggested Change: Amend policy wording in accordance with the advice above. Prepare a more detailed HIA for the campus as a whole.</p>	<p>(HIA) for whole campus</p> <p>Careful design will be needed of any development to ensure the protection and enhancement of nearby heritage assets.</p>	<p>Council to form evidence base.</p> <p>Wording relating to heritage assets accepted, policy to be revised</p>	
Member of public	Object	<p>I would like to object to the prospect of future development and expansion by the UEA on this piece of land. It is a green open space that should be preserved in its current form for the unrestricted use of the general public. Importantly, this landscape plays an important role in supporting wildlife, while it is also enjoyed daily by its countless visitors, staff and students. In fact, part of the reason for selecting the</p>	<p>Loss of green open space.</p> <p>Loss of public access</p> <p>Impacts on biodiversity & wellbeing</p>	<p>The University campus is considered the most appropriate location for university based development. The proposed site largely consists of the existing 'strategic reserve'.</p>	No change.

		UEA for study or employment is this natural environment. Any development would lead to a degradation of this location.		The policy wording already addresses improved public access & biodiversity enhancements in the requirements.	
Member of public	Object	<p>Object to this massive development which will destroy a large chunk of greenbelt land, including trees that contain a diversity of nesting birdlife. Losing more of the green corridor will put pressure on wildlife and the amenities the people of Norwich can enjoy in this area.</p> <p>400 student increase will also put pressure on local amenities such as Eaton Park and the Yare Valley, as well as local shops and bus services. And will also see an increase in traffic along Bluebell Road, thereby increasing carbon emissions while destroying precious woodland.</p>	<p>Loss of green open space.</p> <p>Impacts on biodiversity, climate & wellbeing</p> <p>Impact on local amenities</p>	The University campus is considered the most appropriate location for university based development. The proposed site largely consists of the existing 'strategic reserve'. The policy wording already addresses improved public access & biodiversity enhancements in the requirements	No change
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this university related development.</p> <p>There is also no reference made to existing foul and surface water sewers</p>	<p>Absence of reference to water efficient design</p> <p>No reference to existing drainage infrastructure & how</p>	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Policy wording to be reviewed, details of existing drainage to be clarified & addressed in policy.

		being considered as part of the site layout and design in the site specific requirements.	they will be addressed as part of the site layout and design in the site specific requirements.	Reference to existing Foul & Surface water sewers welcomed	No change regarding Water efficiency Foul & Surface water sewers to be referenced in policy
Member of public	Comment	<p>I am an advocate for preserving the landscape and environment of the Yare Valley. My views are endorsed by the fact that recent high river flows have seen extensive flooding of the Yare Flood Plain. This can only be further exacerbated by climate change and further development within the River Yare catchment. The conservation measures to safeguard wildlife is also imperative for this area.</p> <p>I am informed that previous permission has been given to the UEA for student accommodation within the UEA park the lakeside of the accommodation road from North Park Avenue. This requires the removal of an established belt of trees which hides the stark reality of 1960s architecture of existing UEA accommodation.</p> <p>I object to the proposal of further student accommodation proposed at this site. This is influenced by the fact that substantial student accommodation</p>	<p>Impacts of flood risk & climate change</p> <p>Loss of biodiversity & natural screening</p> <p>Object to further student accommodation being provided on campus due to developments in the city centre.</p>	<p>Landscape issues addressed in existing site allocation policies and strategy.</p> <p>The UEA campus is appropriate location for university-based development. The proposed site largely consists of the existing 'strategic reserve'. Growth plans are evidenced in the DFS 2019</p>	No change

		is being provided within the city centre regeneration plan. i.e. former Norwich Union office accommodation			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0133-E Land at the UEA Grounds Depot Site, Bluebell Road, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	20
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 16 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for UEA	Support	<p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. Detail is provided within the representation</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p>	<p>suggested policy wording</p> <p>Historic England Historic Parkland review</p>	<p>Affordable Housing addressed in strategic policy 5, not repeated in site specific policies</p> <p>The outcome of Historic England's review was not to designate the parkland. – no reference required.</p>	<p>Affordable housing addressed in strategic policy 5</p> <p>No reference to HE parkland review necessary</p> <p>Disabled parking provision added to policy wording</p> <p>No change to scale of development</p>

		<p>The preferred allocation outlines that development on the site should provide affordable housing. However, it is sought to delete this requirement from the preferred allocation's wording. This is due to the fact that Policy 5 of the draft GNLP recognises that the development of purpose built student accommodation within the UEA Campus does not need to provide affordable housing (whereas, development outside of the UEA Campus does).</p> <p>Changes suggested to policy wording relating to affordable housing contributions, landscaping and provision of disabled parking spaces.</p>		<p>Disabled parking facility comment accepted</p> <p>Due to landscape concerns raised by objectors to this site, flexibility of scale not considered appropriate</p>	
Yare Valley Society	Object	<p>Damaging intrusion into Yare Valley Character Area breaking its natural line, and narrowing an important green infrastructure corridor.</p> <p>Impacts adversely on the Valley Green Infrastructure Corridor ability to fulfil key roles of maintaining biodiversity, mitigating climate change, and supporting population well-being.</p> <p>Reduces a green infrastructure that needs to be increased to meet growing population demands.</p> <p>Contrary to Norwich Local Plan Policy DM6 seeking to protect the Yare Valley</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p>	see summary below table	Any change to plan?

		<p>Character Area from building development of this kind. Contrary to Policies of “The Strategy” in the draft GNLP (e.g. policies 3, and 7.1) seeking to conserve and enhance the green infrastructure.</p> <p>The inclusion of the site suggests that Greater Norwich is not serious about implementing its declared green infrastructure policy.</p>	Allocation is contrary to local and strategic policies.		
Norwich Liberal Democrats	Object	<p>The site is seen by the public as being outside of the Campus, with a footpath dividing the developed area of the campus from the non-developed area of the Yare Valley. It is a prominent and sensitive river valley location and lying at a lower level than Bluebell Road any development such as a 5 or 6 storey student accommodation block would be very visible and intrusive in the landscape if developed towards the road end of the site as the lower end towards the river would be liable to flooding. We believe it should remain in its current use as a depot and greenhouses with its relatively minor intrusion in the landscape.</p>	<p>Site is viewed as separate from UEA campus</p> <p>Development of scale would be very visible & intrusive in the landscape.</p> <p>Retain current use</p>	<p>see summary below table</p> <p>Scale of development restricted to 2-3 storey by policy</p> <p>The proposed site is outside of the defined UEA campus boundary, however is owned and in use by the UEA. The site is in an appropriate, well connected location for university-based development. Growth plans are</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>

				evidenced in the DFS 2019	
Member of public	Object	If building development were to take place on this site it would be a serious intrusion into the Yare Valley greenspace, and a threat to the integrity of the Yare Valley in the performance of its green infrastructure roles. It would further increase pressure on the existing green infrastructure which is already under considerable pressure. Such development would be completely contrary to the stated aims of the Norwich Development Management Policy and the draft GNLP Strategy. It would be a clear signal to developers, and the public that Greater Norwich is not prepared to stand by its green infrastructure commitments.	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered
Member of public	Object	<p>I am of the strong opinion that this site should absolutely not be used for any student accommodation development whatsoever. Several locations have in recent years been selected and built on in Norwich for this purpose.</p> <p>The closeness of the protected Yare Valley landscape means that any proposed development would be detrimental to this space, irrespective of suggested planting and biodiversity enhancements. Housing for 400(!)</p>	<p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p> <p>Proximity to Yare Valley will have negative impacts on ecosystem.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		students will have a certain negative impact on the local ecosystem. Urban sprawl in this location should be prohibited for the sake of retaining a public open space and recreation area.	Urban sprawl should be prevented.		
Member of public	Object	<p>This proposal should be rejected on the same grounds that the adjacent GNLP0133F was rejected, that "it is likely to have significant impacts on protected green space, green infrastructure and ecological networks".</p> <p>Moreover, the HELAA comparison table gives the rejected GNLP0133F more 'green' and fewer 'amber' judgements than this site which currently contains a few single storey buildings well hidden behind mature trees and hedges.</p> <p>This proposal would significantly encroach on the green corridor linking the Yare valley with Bluebell Woods and Eaton Park and is contrary to the Strategy principle (para 185) "of enhancing habitats and green infrastructure'.</p>	<p>Site should be rejected on same grounds as adjacent unreasonable site GNLP0133F</p> <p>Proposed allocation is not supported by HELAA conclusions.</p> <p>Negative impacts on green infrastructure</p> <p>Contrary to proposed strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered
Member of public	Object	I strenuously object to building development on this site (GNLP0133-E) as this would be a grievous intrusion into the Yare Valley green space and the existing wildlife would most certainly be compromised. Development of this	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus

		<p>space would be completely contrary to the stated aims of the Norwich Development Management Policy and the draft GNLP Strategy. Greater Norwich must be prepared to stand by its green infrastructure commitments and saying NO to this development would be a clear signal to developers.</p> <p>I am requesting that the site be withdrawn from the list of sites for development.</p>	<p>climate change & supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>		<p>have been delivered</p>
Member of public	Object	<p>I endorse the arguments of the Yare Valley Society. As a long-term resident in the area, and ex UEA student and staff member, I support the need to preserve the Yare Valley as an amenity providing a healthy environment for humans and wildlife. No more buildings please.</p>	<p>See Yare Valley Society</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>
Member of public	Object	<p>I strongly oppose on these grounds:-</p> <ol style="list-style-type: none"> 1. Destruction of natural habit and green spaces which is at odds with environmental protection and attempts to combat climate change 2. Opening door to further linear development beside Bluebell Road - taking all green space 3. Not convinced of the economic case for yet more student accommodation in Norwich - a classic boom and bust is 	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>

		likely which would then be too late for the amenity would be lost.	Green Infrastructure needs to be increased, not reduced. Allocation is contrary to local and strategic policies. Opposition to proposed use for Student Accommodation due to number of recent developments within the city.		
Member of public	Object	I wish to oppose the proposal to construct a substantial student residences building on this site. My grounds are as follows: (1) A very large number of student residences have recently been built or are being constructed by private developers in the City. (2) Building in this location, within the Yare Valley Character Area, would further erode this valuable green corridor and in doing so would be contrary to the Norwich city development policy. The valley at this particular location is narrow and especially vulnerable. (3) The declared strategy in the draft GNLP states an intention to extend and	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being. Green Infrastructure needs to be increased, not reduced. Allocation is contrary to local and strategic policies.	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		enhance the green infrastructure of the area. This proposed building would have precisely the opposite effect.	Opposition to proposed use for Student Accommodation due to number of recent developments within the city.		
Member of public	Object	I wish to object to the above plan as the Yare Valley is an area of beauty that needs to be protected for future generations and this development will seriously detract from the character of the local environment	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being. Green Infrastructure needs to be increased, not reduced.	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered
Member of public	Object	UEA has already caused significant damage to the Yare valley and any further building on site should be stopped. This proposal spreads the area of damage further south along Bluebell Road. The Yare Valley is already over-used in this area, with paths becoming	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		<p>increasingly wide, more and more buildings and the construction of concrete and tarred paths in what was once a beautiful green space. Building yet more student accommodation here will add to the already significant pressure on the river valley. It will also be visually intrusive.</p> <p>Any further reduction in green spaces in the Yare Valley Character Area will have a significant impact on its ability to function effectively in its roles of maintaining biodiversity, mitigating climate change, and supporting informal leisure. We need more, not less, green space.</p> <p>Several Policies in “The Strategy” of the draft GNLP emphasise the importance of green infrastructure, and the intention to extend and enhance it. But the inclusion of the site in the draft GNLP contradicts these stated intentions and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</p>	<p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>		
Member of public	Object	<ul style="list-style-type: none"> The Yare Valley Character Area is more than the sum of its parts. Any reduction in the Valley green infrastructure corridor impacts on its ability to function effectively in its roles of 	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites</p>

		<p>maintaining biodiversity, mitigating climate change, and supporting informal leisure.</p> <ul style="list-style-type: none"> • The Yare Valley Character Area is already under pressure from existing leisure activity overuse (e.g. over-worn paths). In the future it will have to meet the well-being needs of an additional population from new nearby residential development currently under construction. Now is the time to increase the Yare Valley green space, not to reduce it. • The intrusion of building development into the Yare Valley Character Area would be contrary to existing (and continuing) Norwich Development Management Policy which seeks to safeguard the Yare Valley Character Area from building development of this kind. • Several of the Policies of “The Strategy” of the draft GNLP emphasize the importance of green infrastructure, and the intention to extend and enhance it. The inclusion of the site in the draft GNLP contradicts the stated intention and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies. 	<p>biodiversity, mitigating climate change & supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>		<p>within campus have been delivered</p>
Member of public	Object	This proposal is a direct invasion of the green corridor of the Yare Valley which	Damaging intrusion into Yare Valley which	see summary below table	Site proposed to be strategic

		<p>has been long valued as a green infrastructure corridor, supporting informal leisure and maintaining biodiversity. This inclusion by UEA is a test of the integrity of the Council to stand by its words on green infrastructure.</p> <p>The Yare Valley is a precious resource which is being squeezed from all sides, due to inappropriate development. We should be looking to increase green space for the future wellbeing of people and the planet.</p> <p>The new housing in the area of Colney and Cringleford will put great pressure on the valley without the creeping invasion of UEA along the Bluebell lane.</p> <p>Please have the courage and integrity to tell the UEA to plant trees instead!</p>	<p>impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p> <p>Suggest tree planting as preferable alternative to development</p>		<p>reserve, developed only once other sites within campus have been delivered</p>
Member of public	Object	<p>The proposed site will impact negatively on the Broad, destroying wildlife habitats and causing noise and light pollution. At present the area is used extensively by local residents and students</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>

			Green Infrastructure needs to be increased, not reduced.		
Member of public	Object	<p>I wish to object in the strongest terms to the inclusion of this site for the development of student accommodation. The site is part of the Yare Valley, which is supposed to be protected already under the Norwich Development Management Policy, and under the GNLP policies exist to extend and enhance green infrastructure and underline its importance. This proposal is directly contrary to such policies.</p> <p>Any such development would be a major and damaging intrusion into the Yare Valley and would reduce and put further pressure onto an already limited area which currently serves to provide leisure space, biodiversity, and climate benefits in an increasingly urban area.</p> <p>Please do not approve this proposal.</p> <p>some thoughts about the impact of the development:</p> <ul style="list-style-type: none"> • The Yare Valley Character Area is more than the sum of its parts. Any reduction in the Valley green infrastructure corridor impacts on its ability to function effectively in its roles of 	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		<p>maintaining biodiversity, mitigating climate change, and supporting informal leisure.</p> <ul style="list-style-type: none"> • The Yare Valley Character Area is already under pressure from existing leisure activity overuse (e.g. over-worn paths). In the future it will have to meet the well-being needs of an additional population from new nearby residential development currently under construction. Now is the time to increase the Yare Valley green space, not to reduce it. • The intrusion of building development into the Yare Valley Character Area would be contrary to existing (and continuing) Norwich Development Management Policy which seeks to safeguard the Yare Valley Character Area from building development of this kind. • Several of the Policies of “The Strategy” of the draft GNLP emphasize the importance of green infrastructure, and the intention to extend and enhance it. The inclusion of the site in the draft GNLP contradicts stated intentions and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies. 			
Member of public	Object	First and foremost I am an advocate for preserving the landscape and	Damaging intrusion into Yare Valley which	see summary below table	Site proposed to be strategic

		<p>environment of the Yare Valley. My views are endorsed by the fact that recent high river flows have seen extensive flooding of the Yare Flood Plain. This can only be further exacerbated by climate change and further development within the River Yare catchment. The conservation measures to safeguard wildlife is also imperative for this area.</p> <p>I object to the proposal of further student accommodation proposed at this site. This is influenced by the fact that substantial student accommodation is being provided within the city centre regeneration plan. i.e. former Norwich Union office accommodation.</p>	<p>impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.</p> <p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p>		<p>reserve, developed only once other sites within campus have been delivered</p>
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation development.</p> <p>There is also no reference made to existing surface water sewer being considered as part of the site layout and design in the site specific requirements.</p>	<p>Absence of water efficient design</p> <p>Needs to reference existing sewer provisions within site that must be addressed.</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy Information regarding existing surface water sewers on site & regard needed to be given to them is welcomed.</p>	<p>No change regarding water efficient design</p> <p>Reference to existing sewer provision on site referenced in policy</p>

Environment Agency (Eastern Region)	Comment	The very south west of the site allocation, adjacent to the Broad, is in Flood Zones 2 and 3, both now and in the future with climate change. As this is only a very small part of the site then all built development must be sequentially sited outside of the flood zones in Future Flood Zone 1.	Area of site is within flood zones 2 & 3. Development must be sequentially located to flood zone 1 area of site	Comments welcomed, policy wording to be updated to reflect this	Development to be sequentially located to flood zone 1 area of site.
Historic England	Comment	Welcome bullet point 1 in relation to heritage assets.	No issues requiring investigation	noted	no change

Summary:

A number of representations have been submitted in objection (or strong objection) to the proposed allocation of this site. The key areas of concern raised relate to proposed development within the Yare Valley which is considered to be a damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being. Strategic policies within the plan call for improvements and increased provision of Green Infrastructure throughout the plan area, the proposed allocation of this site supports the growth plans of the UEA over the plan period. The policy calls for a low impact development with requirements for high quality landscaping, planting and biodiversity requirements. Development will be sequentially located outside of areas of the site subject to flood risk and promotes pedestrian and cycle access through the site.

Objection has also been raised concerning additional student accommodation in this location, development of student accommodation is addressed in Norwich City Council's PBSA evidence and best practice advice note 2019 which concludes that evidence suggests that there is potential for well design, well located, and appropriately priced PBSA to meet the needs of a greater student population than at present.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0282 Land at Constitution Motors, 140-142 Constitution Hill, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	Welcome bullet point 1 and reference to locally listed building.	None	Noted	No change
Anglian Water Services Ltd.	Comment	Unlike other housing allocation policies there is no reference to water efficiency forming part of the design.	Absence of reference to water efficiency in design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0360 Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	9
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 2 Object, 6 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of public	Support	<p>The Deal Ground offers the opportunity for Norwich to have a vibrant gateway to the Norfolk and Suffolk Broads National Park.</p> <p>The southern rivers of the network have the potential for greater use for tourism, supporting jobs and local economies from Norwich and as far as Beccles. Broom recently ceased boat building just down the river in Brundall.</p> <p>The yacht station on Riverside road is adequate but not a particularly appealing place to be resident for one or more nights. There is opportunity for visitor</p>	Potential for boat/broads related uses, visitor and private moorings	Support welcomed	No change.

		moorings, properties with private moorings and commercial facilities with a focus on the boating community.			
Member of public	Object	Any development of this site will need another road connection not just Bracondale as it's already very busy. Ideally a road link should be built to the Harvey Lane traffic lights, this will provide the necessary additional road link to the site and will reduce congestion on Koblenz Avenue.	Transport related issues relating to inadequacy of existing infrastructure to accommodate scale of development.	Transport and highways issues are recognised and are to be dealt with in the emerging masterplan for East Norwich regeneration area.	Additional bullet point in policy requiring delivery of co-ordinated transport infrastructure
Historic England	Object	This large cross boundary site for 680 dwellings includes a grade II listed bottle kiln and the southern portion of the site lies within the Trowse Millgate Conservation Area. Any redevelopment of this site has the potential to affect these designated heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site. There is currently no reference to these designated heritages assets within the policy or supporting text. To that end, we recommend that reference is made both in the policy and the supporting text to the need to Conserve and where appropriate enhance significance of the grade II listed bottle Kiln and Trowse Millgate Conservation Area (including	Reference needs to be made to heritage assets Concern regarding scale of development impacting heritage assets including long views Suggested Change: Amend policy and supporting text to reference the designated heritage assets and the need to Conserve and where appropriate enhance significance of the grade II listed bottle	Absence of reference to heritage assets noted – policy wording to be reviewed and updated to include references. Wording to address scale and form of development to be considered in policy wording	Additional bullet points added to policy to address heritage

		<p>any contribution made to that significance by setting). While there may be no designated heritage assets in northern most part of the site, any tall structures have the potential to impact on longer views (especially from higher ground) in towards the historic city core (including the castle and cathedral). Although there are no designated heritage assets along this stretch of river bank, this part of the site has a significant potential for archaeology. This should be referenced in the policy</p>	<p>Kiln and Trowse Millgate Conservation Area (including any contribution made to that significance by setting)</p>		
<p>Mr David Maddox for site owner</p>	<p>Comment</p>	<p>Map 9 should include all land within allocation GNLP0360. The masterplan should not be restricted to the production of supplementary planning guidance but seek a coordinated master planning process in collaboration with the Councils. GNLP0360 has the potential to deliver significantly more than 680 new homes and until a masterplan has been completed policy 7.1 should refer to a minimum figure to deliver more than 2,000 new homes. The plan should allow for flexibility on the level of affordable housing to be provided in the Growth Area informed by viability testing of the masterplan and accompanied by an infrastructure funding statement.</p>	<p>Allocation area is unclear on Map 9 & should include all land within allocation GNLP0360</p> <p>This site along with the associated sites in East Norwich Regeneration area have potential to deliver a higher quantum of housing than draft policy allocates.</p> <p>Masterplan should be coordinated with the</p>	<p>Important issues have been raised here which will need to be considered alongside other representations received relating to this site and in association with the East Norwich Regeneration area.</p> <p>Viability issues relating to Affordable Housing</p>	<p>Map 9 to be updated to include all land in GNLP0360</p> <p>Density & deliverability to be explored through comprehensive master planning process required in policy.</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in</p>

			<p>councils and be sufficiently flexible to change</p> <p>Affordable housing should be calculated on evidence based viability, not blanket 33%</p> <p>The representation includes recommended changes to policy wording</p>	<p>expectations noted and to be reviewed.</p>	<p>site specific policies.</p>
Tarmac Limited	Comment	<p>Tarmac Limited operate, and have for many years, a rail connected asphalt and aggregates transshipment operation within the heart of GNLP0360 and note the proposed development aspirations on adjoining land. Whilst it is noted that the land immediately adjoining our site is designated for Employment Use it is acknowledged that residential development is proposed to the east of the employment land. Proposals for such uses need to ensure that they will not place any constraints on the operation of our site which is recognised within the Norfolk Minerals Local Plan as a safeguarded rail depot.</p>	<p>Proposed allocation / development should not jeopardise the functioning of the existing, well established employment use on the site.</p>	<p>Comments noted, the policy seeks exploration for opportunities to relocate this facility to maximise developable area of this site. If relocation is not considered possible as part of this process; the functioning of this facility should not be inhibited.</p>	<p>Additional requirement added to address railhead and minerals and waste policy requirements</p>

Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.	Absence of water efficient design from policy. - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change
Norfolk Wildlife Trust	Comment	we recommend that specific wording is included in the allocation policies to ensure they are properly addressed at the planning application stage. Any applications in proximity to known wildlife sites (as set out in Table 4), as well as irreplaceable habitats such as ancient woodland, and priority habitats (as set out in the NERC Act 2016) should be accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure). GNLP0360 – this allocation partially overlaps with Carrow Abbey CWS. The ecological conditions set out in the 2013 outline planning permission (planning reference 12/00875/O) should be included in the policy wording	Policy wording needs to be strengthened relating to wildlife considerations. The ecological conditions set out in the 2013 outline planning permission (planning reference 12/00875/O) should be included in the policy wording	Policy wording to be reviewed and amended as necessary.	Policy wording updated to reference county wildlife site, green infrastructure already addressed in policy

		We strongly recommend the inclusion of a mandatory requirement for development to include green design features such as green roofs, walls and sustainable drainage.			
Environment Agency (Eastern Region)	Comment	<p>Site adjacent to river – needs to ensure SuDS within the development are sufficient to protect the water quality of the River Wensum and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>The majority of the May Gurney and Deal Ground Site (GNLP0360) is within the flood plain of the River Yare, any development of the floodplain would compromise the natural functioning of the river and the WFD no deterioration objective. There should be a significant buffer between the development and the flood plain. We are working with Norwich City Council on the Yare Valley Parkway green infrastructure corridor, to ensure that the River Yare around the south of Norwich is as good as it can be and to enhance the conservation value of the nature sites along the corridor. Any sensitive development of sections of this</p>	<p>Design of SuDS appropriate to protect water quality & habitat of river Wensum</p> <p>Risks of flooding requires sequential test & specialist design to proposed development on site. Measures proposed in approved application 12/00875/O may no longer be sufficient to address changes through revised climate change levels</p>	Additional detail welcomed	Policy wording and notes updated

		<p>land parcel outside of the flood plain should also restore natural habitats within the flood plain.</p> <p>As stated above, the majority of the site lies in Flood Zones 2 and 3, both now and with the addition of climate change. A significant majority of Flood Zone 3 is shown on our modelling to actually be Flood Zone 3b Functional Floodplain, with an annual probability of flooding of 5% (1 in 20) and classed as 'land where water needs to flow and be stored in times of flood'. Residential and commercial development, classed as 'more vulnerable' and 'less vulnerable' development respectively, is not permitted in Flood Zone 3b so the majority of the site will need to be left undeveloped.</p> <p>As with all development in Flood Zones, the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built</p>			
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		<p>development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage.</p> <p>We note that there is an extant outline permission on the site, which met these requirements, although climate change allowances have since changed so the required floor levels may be different. This should be addressed as part of the reserved matters applications.</p>			
Broads Authority	Comment	<ul style="list-style-type: none"> • Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'. • Could it make the most of its riverside location? • Bullet point 1 – last part refers to not prejudice future development of or restrict options for the adjoining sites. But the Utilities site is over the river, so not adjoining. Should the policy refer to the Utilities site in this sentence as well? • Is the scheme expected to provide the walkway/cycleway and to what standard? 	<p>Affordable housing policy wording needs strengthening/review</p> <p>Potential to enhance riverside location</p> <p>Clarification relating to development of associated sites in East Norwich Regeneration area.</p> <p>More detailed required relating to walkway/cycleway</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Need for clarity relating to reference to R10 Utilities site accepted</p> <p>Comments regarding Heritage assets accepted</p>	<p>Affordable housing no longer addressed in site specific policies</p> <p>Included reference to R10</p> <p>Heritage assets addressed</p>

		<ul style="list-style-type: none"> • There appears to be no mention of protecting and enhancing designated / non-designated heritage assets. There is a listed lime kiln on the site and I think potentially some locally identified HAs. 	Absence of reference to heritage assets requires review	Riverside walk detail to be addressed	
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FOOTNOTE

Please note that individual policies GNLP0360 (The Deal Ground), GNLP3053 (Carrow Works), and R10 (Utilities site) have now been combined into a single East Norwich Strategic Regeneration area strategic policy reference: GNLP0360/3053/R10

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0401 Former Eastern Electricity Headquarters, (Duke's Wharf) Duke Street, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for Highcourt Developments Ltd	Support	<p>Support for mixed use redevelopment Site is capable of accommodating a minimum of 100 homes (or at min 250 bed student accommodation) + a range of other uses to provide a balanced mix.</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site 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. (Further detail provided in rep.)</p>	<p>Explanation of energy and water policy required, is it unnecessary repetition of policy 2, or is it over & above? If so needs further detail.</p> <p>Greater flexibility required regarding use of existing building.</p> <p>Provision of riverside walk is unnecessary in this location. Permeability of the site is accepted.</p>	<p>Energy & water efficiency comments accepted</p> <p>Approach to existing buildings with reference to existing site allocation policy accepted.</p> <p>Approach to riverside walk in this location reviewed.</p>	<p>Energy and water reference omitted as covered in strategic policy 2.</p> <p>Approach to existing buildings revised.</p> <p>Riverside walk requirements omitted as this is not a priority of RWS & cannot connect to West. Permeability and making most of</p>

		<p>Previous consents have been granted on site & continued pre-app discussions are underway.</p> <p>Suggested amendments to site policy:</p> <ul style="list-style-type: none"> • Whilst the principle of securing a high quality design is supported, clarification is required as to what is envisaged by energy and water-efficient design. If the requirements are the same as those required by Policy 2 (Sustainable Communities) the reference should be removed in order to avoid duplication of policies. It is not a requirement that has been repeated in other site specific policies. If the requirements are greater than those detailed in Policy 2 (Sustainable Communities), the policy needs to make it clear that they are subject to feasibility and viability, so as to no undermine the deliverability of the site. • As per the existing site allocation (Policy 21), rather than state that any proposal should 'seek to retain and secure the beneficial regeneration and reuse of existing riverside buildings', the policy should state that 'development 			<p>riverside location addressed in policy requirements</p>
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		<p>may include either the conversion of existing buildings or redevelopment'. This approach provides flexibility and reflects the potential complexities relating to the comprehensive redevelopment of a city centre site and that the reuse of buildings may not be practical or feasible.</p> <ul style="list-style-type: none"> • The principle of providing permeability across the site is supported. However, the requirement of a riverside walk should the existing buildings be demolished is considered unnecessary. The principle of permeability can be achieved without the provision of a riverside walk and given there is no riverside walk to the west or east of the site, the walk is considered unnecessary, given that it would cover a small area and, therefore, serve little function. <p>Suggested policy wording has been included in rep.</p>			
Historic England	Object	<p>This site is located within the Norwich City Centre Conservation Area. There are a number of listed buildings in the vicinity of the site including St Gregory Church and Strangers Hall Museum, both listed at grade I, 2 Charing Cross</p>	<p>Broadly supportive of principle of redevelopment of site, welcome commitment to appropriate scale & form of development</p>	<p>Additional detail required relating to historic environment and heritage assets accepted.</p>	<p>Additional bullet point included to strengthen reference to heritage assets.</p>

		<p>listed a grade II* as well as numerous buildings and structures listed at grade II. Redevelopment of the site therefore has the potential to affect these heritage assets and their settings. This site benefits from Planning permission and so the principle of development has already been established on this site. Historic England is broadly supportive of the principle of redevelopment of this site and has provided advice over many years in relation to this site.</p> <p>We welcome the commitment in the policy to an appropriate scale and form of development in bullet point 1</p> <p>We welcome the reference to the conservation area in bullet point 1 but suggest that a separate bullet point is included in relation to the historic environment in relation to the need to Conserve and enhance the significance of heritage assets (including any contribution made to their significance by setting) including the City Centre Conservation Area, Grade I listed St Gregory's Church and Strangers Hall Museum, grade II* listed Charing Cross and other buildings listed at grade II.</p>	<p>Concern regarding intention to increase density on site & potential impact on heritage assets.</p> <p>Welcome the commitment to riverside access for walk.</p> <p>Welcome reference to Conservation area but suggest further bullet point is added to directly address other heritage assets affected by proposed development.</p>	<p>Riverside walk approach reviewed in association with other representations received.</p>	<p>Riverside walk wording amended to reflect the absence of riverside walk connectivity to West.</p> <p>Scale and form already referenced in policy requirements – no change</p>
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		<p>We welcome the commitment to riverside access for walk in bullet point 4.</p> <p>We note a desire to increase density at the site but emphasise that it is important that this must not cause a greater degree of harm on the historic environment.</p> <p>Suggested Change: Suggest that a separate bullet point is included in relation to the historic environment in relation to the need to Conserve and enhance the significance of heritage assets (including any contribution made to their significance by setting) including the City Centre Conservation Area, Grade I listed St Gregory's Church and Strangers Hall Museum, grade II* listed Charing Cross and other buildings listed at grade II.</p>			
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change
Environment Agency (Eastern Region)	Comment	The site lies in present day Flood Zone 2, but once climate change is added to the flood levels, the majority of the site lies in Flood Zone 3a High Probability. If	Site is within flood zone 2 and climate change flood zone 3. Suggested outline	Additional detail welcomed	Policy requirement added – additional comments in policy notes

		<p>possible the development should be sequentially sited on land to the south in Flood Zone 1.</p> <p>If development is required to be sited within these future Flood Zone 3 (1%cc) outlines then the more vulnerable residential development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any new built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to the south to provide the compensatory flood storage.</p>	<p>approach required to address this.</p>		
Broads Authority	Comment	<ul style="list-style-type: none"> • Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNL0312 is firmer saying 'will'. 	<p>Ambiguous Affordable Housing policy wording requires strengthening.</p> <p>Clarification required relating to energy and water policy wording.</p>	<p>Affordable Housing, Energy and Water requirements dealt with in strategic policies – to be omitted from site specific policies to</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p>

		<ul style="list-style-type: none"> • Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document? • Where it says ‘respect its riverside location’ what does that mean? Could it make the most of its riverside location? • Bullet point 2 – so will the development be on the existing car park? • Bullet point 4 implies the walkway/cycleway/ will be provided as part of the scheme – but other policies are not that clear. Is the scheme expected to provide the walkway/cycleway and to what standard? 	<p>Clarification required to riverside location required.</p> <p>Clarification regarding decommissioning carpark required.</p> <p>Detail required relating to walkway/cycleway.</p>	<p>be consistent with policies throughout hierarchy</p> <p>Existing car park is temporary consent., the policy does not seek to retain this use, but to maximise developable are in this location.</p> <p>Riverside walk approach reviewed in association with other representations received.</p>	<p>Energy and water requirements omitted as covered in strategic policy 2</p> <p>Riverside walk wording amended</p>
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0409R Land at Barrack Street/Whitefriars, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
CODE Development Planners Ltd for Jarrod & Sons Ltd	Object	<p>Earlier representations contended that the area currently identified as GNLP0409R be included within the Greater Norwich Local Plan (GNLP) as two separate allocations with the areas shown on drawings 8436-FM-DR-2000-A00 and 8436-FM-DR2001-A00. Jarrod & Sons contend that a single allocation as set out under GNLP0409R is unsound</p> <p>The undeveloped land within Jarrod & Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.</p> <p>Planning permission 18/01286/F has lawfully commenced on site, it is</p>	<p>The site allocation policy is unsound, based on insufficient and out of date evidence. The amalgamation of the two allocations is inappropriate and should be reviewed in accordance with detail provided.</p> <p>Parking issues exist with unbalanced approach across plan area which</p>	<p>Approach to allocation split into two areas to reflect current consents and future intentions as suggested</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Whitefriars site policy reflects</p>	<p>Allocation split into two areas to reflect current consents and future intentions as suggested</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Whitefriars site policy reflects current consent.</p>

		<p>expected to be close to completion by the time the GNLP is examined by an inspector & fully complete by adoption of GNLP under current timescales.</p> <p>The approved site provides 10% affordable housing.</p> <p>Planning consent 08/00538/RM – plots F1 & F2 have been agreed by Norwich City Council as lawfully commenced – therefore the permission is in perpetuity (however the sites have not progressed despite active marketing)</p> <p>Planning consent 15/01927/O has lapsed.</p> <p>Allocation needs to address market trends for car parking allowances for site to be considered desirable.</p> <p>GNLP0409R as proposed is not considered sound, and undermines the soundness of the plan.</p> <p>Affordable housing requirement unrealistic due to 10% consented on approved scheme would make development of remaining land unviable if it were expected to provide the shortfall from the 28% policy requirement.</p>	<p>undermines the strategy & hierarchy.</p>	<p>current consent. Barrack Street policy includes flexibility</p> <p>Site is in a location appropriate for low car or car free housing alongside other commercial and ancillary uses.</p> <p>Parking issues refer to strategic approach.</p>	<p>Barrack Street policy includes flexibility</p> <p>Site is in a location appropriate for low car or car free housing alongside other commercial and ancillary uses.</p> <p>Parking issues refer to strategic approach.</p>
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		<p>Contest that this is not an artificially subdivided site.</p> <p>No evidence that mixed use development required by policy is viable & deliverable & no response to why the alternatives proposed by Jarrold & Sons in previous consultations/call for sites are not reasonable..</p> <p>Jarrold & Son contend that due to the context of the remaining area of land available for development (i.e. the area of the proposed allocation excluding the area of Hill Residential's development) the land use is less important than the quality of development and that the remaining areas are developed.</p> <p>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. The GNLP0409R allocation as currently worded undermines other policies within the GNLP.</p> <p>Without suitable mechanisms to support city centre development it is unlikely</p>			
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		<p>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.</p> <p>Evidence suggests that there is a potential oversupply of office/employment land in the plan area. Constraints in Norwich City Centre regarding cost of land & reduced car parking levels threaten desirability of this type of development within the city: <i>“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</i></p>			
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	<p><i>within its documents and evidence base it fails the tests of soundness”.</i></p> <p>Imbalance in parking policies between Norwich & Broadland: <i>“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”</i></p> <p>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-DR2001-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.</p> <p>Amalgamation of previously separate allocations does not reflect the up to date position in relation to extant planning permissions and associated construction</p>			
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		<p>and completions. In its current form it does not satisfy the test of soundness. It has been made without sufficient or up to date evidence.</p> <p>Whilst Jarrold & Sons supports the move away from the outdated allocation of CC17a and CC17b the proposed approach to assessing the site is unjustified. The evidence base does not contain details of the assessments for the reallocation potential of existing commitments to support the sites amalgamation.</p> <p>Suggested modifications to the policy wording have been provided by CODE.</p>			
Historic England	Object	<p>This site includes the grade II listed 77-79 Barrack Lane, part of the City Walls and towers which is a scheduled monument and also the western part of the site lies within the City Centre Conservation Area.</p> <p>This is the immediate setting of part of the Scheduled City wall, the grade I listed St James's Mill, the grade II listed numbers 77-79 Barrack Street and the grade I listed former church of St James. It is also in the wider setting of a number of other heritage assets including Norwich cathedral. Any development of</p>	<p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets.</p> <p>We suggest a more detailed HIA is prepared for this site. We welcome the reference to the City</p>	<p>Incorrect reference to ancient acknowledged and to be amended</p> <p>Part of this site is currently under development. As part of the application, significant consideration was given to the historic environment. We</p>	<p>'ancient' deleted 77-79 Barrack street directly referenced.</p> <p>Additional HIA not considered necessary</p>

		<p>the site has the potential to impact upon these heritage assets and their settings The site was most recently occupied by Jarrold's printing works which incorporated the 1836 textile mill and an abutting modern building which now contains the printing museum. The site has much earlier origins and stands between the river Wensum and the medieval city wall. This section of the wall ran between the tower on Silver Road to another on the waterfront. As well as River Lane, a street running immediately inside the wall, the site featured a number of elongated property boundaries stretching back from the river reflecting the value of waterfront commercial property. Within the walls was a densely built mixture of domestic and commercial property with the part of the application site outside the walls less developed with garden areas surviving through to the 20th century. In the 19th century the commercial property along the waterfront was redeveloped sometimes without heed to the medieval boundaries with more substantial building of which St James' mill is a good example. This tall, elegant building establishes a scale of development on the waterfront which other modern building adjacent has respected. At the</p>	<p>wall in bullet point 2 (although delete the word ancient as we would normally refer to these as scheduled monuments now). We suggest that you specially refer to the grade II listed 77-79 Barrack Street.</p> <p>Suggested Change: Delete ancient Refer specifically to 77-79 Barrack Street. We suggest a more detailed HIA is prepared for this site.</p>	<p>are satisfied that the information produced by the developers and our review of this is sufficient. Additional text relating to historic environment to be included in policy but request for HIA not considered a requirement for this policy.</p>	
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		<p>northern side of the site the small houses of the 18th and early 19th centuries which characterised parts of Norwich before the Victorian period are represented by numbers 77-79 Barrack Street. These are remarkable survivals and reflect the scale of much of the historic building in this area. The 19th and early 20th century building on the northern side of Barrack Street is also domestic in scale while the former church of St James (the Norwich Puppet Theatre) is a relatively modest building of the 15th century with a low octagonal tower.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. We suggest a more detailed HIA is prepared for this site. We welcome the reference to the City wall in bullet point 2 (although delete the word ancient as we would normally refer to these as scheduled monuments now). We suggest that you specially refer to the grade II listed 77-79 Barrack Street.</p> <p>Suggested Change: Delete ancient</p>			
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		Refer specifically to 77-79 Barrack Street. We suggest a more detailed HIA is prepared for this site.			
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	welcome the reference made to the achievement of a water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.
Environment Agency (Eastern Region)	Comment	The development should be sequentially sited in future Flood Zone 1 where possible. If development is required to be sited within these future Flood Zone 3 (1% annual probability with 35% climate change) and Flood Zone 2 (0.1% annual probability with 35% climate change) flood outlines then the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change	Development should be sequentially located in future Flood zone 1 where possible. Advised approach to any development within areas of future flood zone 3 within the site. Note exiting consent which was not objected to by Environment Agency..	Additional detail welcomed	No change

		<p>flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change.</p> <p>We note that there is an extant planning permission for the site, to which we had no objection, so these requirements should have already been taken into account.</p>			
Broads Authority	Comment	<ul style="list-style-type: none"> • Could it make the most of its riverside location? • Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'. • Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document? • Bullet point 7 – so will they provide a river side path? Or maybe do it? Part of the bullet says to do it and then the other says potential future extension – suggest this is clarified. GNLP0401 equivalent bullet points implies the walkway/cycleway will be provided as part of the scheme. Is the scheme 	<p>Ambiguous wording of Affordable Housing policy.</p> <p>Clarification of water & energy efficiency policy – or is this repetition of policy 2?</p> <p>Clarification required relating to riverside setting & provision of walkway/cycleway.</p> <p>Contradictory approach to car parking on site.</p>	<p>Policy to be reviewed and amended as necessary.</p> <p>Approach to riverside walk revised in response</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Water efficiency omitted – covered in strategic Policy 2</p>

		<p>expected to provide the walkway/cycleway and to what standard?</p> <ul style="list-style-type: none"> • Page 24, para 2 – so the policy refers to car free or low car usage, but the offices will have a car park; is that contradictory? 			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0451 Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street, Norwich. (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	The site lies within the City Centre Conservation area and there are a number of grade II listed buildings nearby. Any development of the site has the potential to impact upon these heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and	Supportive in principle subject to including reference to heritage significance in the policy. Include reference to scale and massing in policy	Need for reference to scale and massing accepted.	Policy wording reviewed and amended to address heritage assets, scale and massing

		<p>enhances the heritage assets. This should be reflected in the policy. We welcome the reference to the Conservation Area and other heritage assets in bullet point 1.</p> <p>Suggested Change: We suggest including reference to significance in the policy. Include reference to scale and massing in policy.</p>			
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome the reference made to the achievement of a water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Water efficiency reference omitted due to repetition of policy 2

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0506 Land at and adjoining Anglia Square, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	7
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 5 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Chris Watts on behalf of Columbia Threadneedle	Support	<p>Anglia Square is the most significant regeneration site in Norwich City Centre and currently the subject of a 'call-in' public inquiry for comprehensive redevelopment comprising up to 1,250 homes (including a minimum of 120 affordable homes), hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship, and associated works to the highway and public realm.</p> <p>Accordingly, we support the provisions of Policy GNLP0506 which allocates land at and adjoining Anglia Square for residential-led mixed use development as the focus for an enhanced Large</p>	<p>Subject to outcome of public enquiry the site owner considers it a realistic prospect that the site will deliver in the region of 1,200 homes including a minimum of 120 affordable homes.</p> <p>This accounts for viability considerations and is consistent with the current proposals for Anglia Square.</p>	Support welcomed	No change

		<p>District Centre and to act as a catalyst for wider investment in Norwich City Centre.</p> <p>We consider it a realistic prospect that the site will deliver in the region of 1,200 homes including a minimum of 120 affordable homes. This accounts for viability considerations and is consistent with the current proposals for Anglia Square.</p>			
Historic England	Object	<p>Site is within Norwich City Centre Conservation area and affects the setting of numerous listed buildings. Any development of the site has potential to impact upon these heritage assets.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. However, object to the allocation as currently proposed.</p> <p>The scale of the proposed development would be inconsistent with the council's development management policies, as well as with broad strategic objectives, because it would entail development which would cause severe harm to the</p>	<p>Concerns relating to scale and form of development, its impact (harm) locally and in a wider perception on heritage assets and the historic character of Norwich.</p> <p>suggest that the allocation should be based on the reinstatement of the lost historic street pattern – as envisaged by the policies in the conservation area appraisal. It should rest on an understanding of how mid- to high density</p>	<p>Concerns noted as per concerns raised by Historic England relating to current planning application under consideration/call-in.</p> <p>Need to strengthen wording relating to heritage assets acknowledged and accepted.</p> <p>Work relating to tall buildings in Norwich is ongoing separate to this site specific policy.</p>	<p>Wording relating to heritage assets strengthened.</p> <p>Tall buildings work being covered in separate study.</p> <p>Densities and historic street patterns not in accordance with current SPD approach & application subject to current call-in/inquiry.</p>

		<p>character of the city centre conservation area and harm to a variety of other designated heritage assets of the highest significance.</p> <p>We consider that the indicative capacity of 1200 dwellings cannot be achieved without harm to the historic environment.</p> <p>we suggest that the allocation should be based on the reinstatement of the lost historic street pattern – as envisaged by the policies in the conservation area appraisal. It should rest on an understanding of how mid- to high density development can be accommodated in a manner appropriate to the wider character and grain of the city. Elements fundamentally incompatible with this – notably the provision of c. 600 car parking spaces – should be omitted. Finally the dwelling capacity should be reduced.</p> <p>in relation to the current wording of the allocation, there is currently no mention of the Conservation Area within the policy. We suggest this be amended.</p> <p>Bullet point 6 refers to a landmark building or buildings to provide a focal point for the northern city centre. We</p>	<p>development can be accommodated in a manner appropriate to the wider character and grain of the city</p> <p>Elements are fundamentally incompatible with this (such as 600 space car park)</p> <p>Dwelling capacity should be reduced</p> <p>Wording relating to historic environment, heritage assets including conservation area need to be included in policy.</p> <p>Lack of clarity over scale and massing of 'landmark building'</p> <p>Suggested Change: Include reference to the City Centre Conservation Area and other heritage assets in the policy.</p>		
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		<p>have concerns regarding this bullet and in particularly the lack of clarity regarding an appropriate scale and massing of such development. We do however welcome the need for any such development to be sited to conserve and enhance heritage assets and their setting (although again we would recommend the inclusion of the word significance).</p> <p>However, it is about more than just individual heritage assets and their settings but extends to the character and skyline of the city as a whole. To that end we suggest that further work needs to be done to provide an appropriate evidence base for a tall buildings strategy for the city</p> <p>.</p>	<p>Amend policy to reduce indicative dwelling capacity, remove requirement for car parking, and ensure the reinstatement of the historic street pattern and a more appropriate density of development to reflect the grain of the area and to conserve and enhance heritage assets.</p> <p>The policy will need to be reviewed following the outcome of the Planning Inquiry for this site.</p> <p>Undertake a tall buildings study to inform an appropriate strategy for such development within the City – see comments in Appendix A</p>		
Pegasus Group for into Properties Plc	Object	We do not have any objection to the principle of the regeneration of Anglia Square, rather intu wish to ensure that any future redevelopment of Anglia	Concerns raised that Anglia Square should retain it's position as a large district centre as	Reference to Anglia Square's position as part of a large district	reference made to retail units contributing to the Magdalen

		<p>Square will be appropriate to its role and function as a large district centre and some wording changes to the policy for site GNLP0506 are suggested in the full representation.</p> <p>Clearly, the draft Strategy Greater Norwich Local Plan seeks to ensure that redevelopment of Anglia Square will be appropriate to the form and function of its role as a Large District Centre. The redevelopment of Anglia Square will therefore need to serve the daily needs of its existing and proposed resident populations (for example, in relation to convenience shopping provision). Furthermore, its retail offer should be distinct from the primary retail functions of the City Centre and compliment rather than compete with the City Centre.</p> <p>However, the Site-Specific Allocation for Anglia Square (Policy GNLP0506) is silent on the need for the redevelopment proposals to create a form of development that is appropriate to its role and function as a large district centre.</p> <p>In order to ensure compatibility with the draft Strategy document of the Greater Norwich Local Plan, it is necessary for site specific Policy GNLP0506 to</p>	<p>designated in the hierarchy, to support and not compete with city centre retail offering.</p> <p>Focus on reduced reliance of car use rather than provision of large car park.</p>	<p>centre acknowledged – include in policy.</p> <p>Low car or car free housing is already supported within the policy requirements; car parking to support the local centre as existing surface car parking provision in this location is being lost & existing multi-storey is no longer functioning. There is not a specified quantum of car parking spaces required in the allocation policy, this would be subject of consideration of a planning application</p>	<p>Street/Anglia Square large district centre</p> <p>No change relating to car parking in policy.</p>
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		recognise the need for any scheme coming forward to complement rather than compete with the city centre in terms of trading potential, to serve the day to day convenience needs of its resident hinterland, and will be appropriate to its role and function as a large district centre (recognising its position in the local retail hierarchy).			
Cathedral, Magdalen and St. Augustine's Forum (CMSA)	Object	<p>CMSA objects to the designation of the Anglia Square site for 1200 housing units. This represents an over-densification of the site, and one that fails to take account of the principally mid-rise nature of this part of the city centre, its heritage context, and the mixed use and fine grain nature of the surrounding areas, which is emerging as Norwich's creative and digital industries quarter.</p> <p>The proposed allocation is contrary to the very high level of local opposition and statutory consultee objections</p> <p>These representations, and much of the evidence presented at the call-in suggest that the quantum of residential development proposed for the hybrid development application, which we note is being proposed as the allocation of residential units for the purposes of the</p>	<p>1200 dwellings allocated to the site which was the subject of the Weston development to be too great a number</p> <p>This density of residential units precludes other uses such as those cultural, economic and community uses for which there is a need and local ambition, and which should be prioritised on a site that is so well served by public transport (of which there are not many across the whole of Norfolk).</p>	<p>Density of allocation is informed by viability of scheme considered through recent planning application and failure of previous lower density consents to deliver on this site. Following the decision from the call-in application housing numbers/density to be reviewed.</p> <p>Objection relating to building safety do not directly relate to the</p>	Revise housing figure for policy

		<p>Greater Norwich Local Plan, was plainly too great combined with that of commercial units to be sustainable on this site.</p> <p>This does not conform to the requirement to allocate 'sustainable development' as set out in the NPPF. The recent Heathrow decision demonstrates the Government's resolution to deliver on sustainable development, and we suggest that if the plan incorporates this intention in this location, then it will not meet the test of sustainability.</p> <p>There are further issues of building safety attaching to high and over dense development which are highlighted by the Hackitt report and which the public enquiry on Grenfell currently underway is beginning to reveal. We do not believe that there is any reason for central Norwich to accept this level of density given that there is an 'overhang' of unexercised permissions across the greater Norwich area which are a hangover from the GNDP. As land supply is patently not the issue in solving Norwich's housing needs this ill-conceived and over dense allocation should be removed from the plan.</p>	<p>A quantum of residential dwellings considerably in excess of 1200 could be achieved in the North City Area but over a wider area drawing upon a number of redevelopment sites.</p> <p>There should now be an imperative (following the representations made by many objectors during the course of the public enquiry which showed that the form of development proposed by Weston/Columbia Threadneedle will not meet local housing needs) to adopt a strategic regeneration framework to deliver housing appropriate to meeting locally defined need with units with a range of typologies designed to meet</p>	<p>requirements of this allocation policy</p>	
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		<p>the now expired North City Area Action Plan should have been updated by Norwich City Council, to consider a strategic regeneration and intensification approach to the wider area.</p> <p>This would have ensured that infrastructure needs of the fully regenerated area and its catchment could have been properly considered; parking could have been solved on an area-wide basis, and an appropriately scaled set of developments at both Anglia Square and a range of sites that may come up across the area over time at the 'gentle density' could have been planned for, such as was recommended in the Building better, Building Beautiful report as more desirable, valuable and liveable on a long term basis. Without having undertaken technical capacity studies it is our view that the 1200 residential units allocated to Anglia Square in the draft GNLP plan is both an over-densification of this sensitive site, and an under ambitious allocation for the wider North City Centre Area – were a coordinated area action plan to be put in place for the North City Centre area.</p>	<p>identified needs of local people.</p> <p>Additional transport issues related to Magdalen street serving the North East Growth Triangle proposals.</p>		
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		we contend that this density of residential units precludes other uses such as those cultural, economic and community uses for which there is a need and local ambition, and which should be prioritised on a site that is so well served by public transport (of which there are not many across the whole of Norfolk)			
Member of public	Object	I object to a high rise building being built in the Anglia square area. The North of the city is a beautiful and historic area of the city with a sky line currently dominated by the spire of the cathedral. This area needs a building that will not spoil the skyline of the North of the city. Views from the Sewell Park would be spoilt and views from Mousehold. Norwich attracts a lot of visitors because it is such an attractive city. I don't want commercial forces to destroy the unspoiled nature of the city.	Inappropriate scale of building for location, impact on historic character of North City location and beyond	Objection to scale of building relates to recent planning application rather than requirements of site allocation policy. Scale of building is not explicitly expressed within site allocation policy, however, following result of recent inquirey, housing numbers to be reviewed.	Revise housing figure for policy
Member of public	Object	Proposed allocation is ill thought through & will bring little benefit to the area. Big capital projects do not serve the needs of the population	Allocation is ill thought through, there is insufficient public benefit from the proposed development	Objections relate to the content of the planning application subject to call in. The allocation does not explicitly propose a	Revise housing figure for policy

		<p>Health & Safety concerns relating to the scale of the tower.</p> <p>Proposal will result in a large debt</p> <p>The proposal will not serve the needs of the community who currently use Anglia Square.</p> <p>Development will take a long time to complete & cause traffic issues.</p>	<p>Development will not serve the needs of the community who currently use Anglia Square</p> <p>Timescales required will cause disruption</p>	<p>tower to which health and safety concerns are raised. Following the decision of the recent inquiry housing figure to be reviewed</p>	
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design.</p>	<p>Absence of water efficient design in policy.</p> <p>Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. No Change</p>

Additional points raised by CMSA relating to the wider GNLP policies

- A second critical objection to the plan is the anticipation that Magdalen Street (and other key arterial routes) which are narrow historic routes lined with heritage buildings have the capacity to accommodate the level of increased bus use to serve the growth aspiration set out in the proposed plan for the North East Growth Triangle. Magdalen Street already suffers high levels of pollution, potential structural damage to buildings and endangers pedestrians through the high level of buses using the route. The plan appears to be looking to compound this to service the movement requirements of the peripheral growth areas. This is not acceptable to us. The strategy as currently cast will see residents and businesses in the city centre carrying the cost in terms of increased pollution; harm to the built fabric; harm to the liveability and amenity of the city centre and potential harm to individuals through accident.
- It is our view that that transport strategy under-pinning the proposed level of growth for the great Norwich area needs to be urgently reviewed in the light of the requirement to deliver sustainable development as set out in the NPPF, and now backed up by the Heathrow decision. In order to sustainably unlock the high level of growth anticipated, a fundamental rethink of the movement infrastructure required to service this should take place, backed up by a revised land use/land allocation strategy to support investment in public transport and a disposition of uses and densities of new development that will enable viability and underpin an ambitious public transport proposition. This would also serve to underpin a value capture model to enable delivery.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2114 Land at and adjoining St Georges Works, Muspole Street, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Lanpro Services Ltd for Our Place	Support	<p>The site owner is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be deliverable and suitable for mixed use development that can come forward within the plan period to 2038.</p> <p>However, in light of potential fluctuations in market conditions and noting the lack of viability or deliverability information supporting the draft Plan, they question the justification for the quantum [of Affordable Housing] specified within draft allocation GNLP2114 and respectively request that it be reworded to ensure that it promotes and does not constrain,</p>	<p>Affordable housing requirement is unevidenced & has potential to make development unviable.</p> <p>Greater flexibility to proportion /mix of uses to aid viability & deliverability.</p>	<p>Support for allocation welcomed</p> <p>Affordable housing policy dealt with in strategic policy 5. Not repeated in individual site specific policies to be consistent with approach across hierarchy</p> <p>As stated in policy supporting text – retention of</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies..</p> <p>No change to Flexibility of uses.</p>

		<p>the scale, form, mix and timing of the site's future development.</p> <p>Suggested revision to policy wording provided in representation.</p>		<p>existing employment is highly desirable as part of a wider initiative in the Northern City Centre Strategic Regeneration Area – no change</p>	
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and would appear to be immediately adjacent to the grade II listed 47 and 49 Colegate and Woolpack Public House. Any development of this site has the potential to impact upon these designated heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. At street level, it will be important for the new development on the rest of the site to reinforce the scale, form and grain of the historic streets around. We welcome the reference to the Conservation Area in bullet point 2. We suggest that specific mention is also made of the adjacent listed buildings. The policy should be amended to read that preserves and enhances the</p>	<p>Suggested Changes: Specific mention should be made of the adjacent listed buildings. The policy should be amended to read that preserves and enhances the significance City Centre Conservation Area and nearby designated heritage assets including 47 and 49 Colegate and the Woolpack Public House, all listed at grade II including any contribution made to that significance by setting.</p>	<p>Policy to be reviewed and amended as necessary.</p>	<p>Heritage policy wording strengthened.</p>

		<p>significance City Centre Conservation Area and nearby designated heritage assets including 47 and 49 Colegate and the Woolpack Public House, all listed at grade II including any contribution made to that significance by setting.</p> <p>We welcome the commitment in bullet point 4 to the protection of key views of the tower of St George's Colegate.</p>			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2159 Land at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane Car Park, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for Dacre Property Holdings	Object	We wish to withdraw our support for the proposed residential allocation of the eastern part of the site (84-120 Ber Street and Mariner's Lane Car Park) on the basis that it is no longer available for residential purposes. Land to the west (147-153 Ber Street) remains available, and the current allocation (CC2) for a minimum of 20 dwellings on this part of the site should be carried forward.	Withdrawal of part of site from allocation	Policy maps and wording will need to be revised to address the impact of loss of part of this allocation. Housing figures for Norwich will need to be amended to account for this change	Delete policy GNLP2159, reinstate / carry forward allocation CC2
Historic England	Object	This site lies within the Norwich City Centre Conservation Area. There is a grade II listed building, the Remains of the Church of St Bartholomew, to the	Suggested Change: We recommend amending the wording	Comments accepted, additional detail to	Policy GNLP2159 no longer promoted by landowner. Policy

		<p>north of the site and a number of grade II listed buildings on the opposite side of Ber Street. The Grade I listed Church of St John de Sepulchre lies to the south of the site and the site forms part of the setting of this church.</p> <p>Any development of the site therefore has the potential to impact upon these designated heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. This should be reflected in the policy.</p> <p>We welcome the reference to the Conservation area and heritage assets including the Church of St John within bullet point 1. The policy wording would be further improved by reference to significance.</p>	<p>of bullet point 1 to refer to significance. Include reference to scale and massing in policy.</p>	<p>be provided in policy.</p>	<p>to be deleted, existing allocation CC2 to be carried forward</p>
<p>Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Policy GNLP2159 no longer promoted by landowner. Policy to be deleted, existing allocation CC2 to be carried forward</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site 2163 Friars Quay Car Park, Colegate (former Wilson's Glassworks site), Norwich. (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Lanpro on behalf of the landowner	Support	<p>Greater Norwich Local Plan Regulation 18 Draft Plan ref: GNLP2163 Friars Quay Car Park, Colegate</p> <p>This representation is made on behalf of the landowner of the above site to the current Regulation 18 consultation. The site has been considered by the Greater Norwich Local Plan (GNLP) as one of their preferred sites.</p> <p>The site is available, and the landowner is fully supportive of this site being allocated for the proposed development for a minimum of 25 dwellings.</p>	No issues requiring investigation	Support noted	No change

Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. This site is an important one in this part of the Norwich conservation area and is in the setting of several listed buildings. It forms part of the south side of Colegate, the principle historic street of what was once the Norvic settlement and which contains numerous important historic buildings including several listed ones. A group of grade II listed buildings are situated on Colegate at the north end of the site as well as the parish church of St George (grade I listed) and the grade II* listed Bacon's House and numbers 2-9 Octagon Court. The site also lies in an interesting position in the conservation area where the nature of historic building changes. Modern development between Colegate and the river (Friar's Quay) is akin in scale and form to the generally low-rise, domestic scale of development on the north side of the River stretching along Colegate eastwards to Magdalen Street. The Friar's Quay development is a very successful and early example of modern residential development in an historic city which responds to the historic 'grain' of development from a time when development commonly disregarded it. To the west side of the application site is St Andrew's Street,</p>	<p>Significant heritage interest on site and in surrounding area. Suggested wording provided to strengthen the policy in this respect:</p> <p>Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale, grain and massing in policy. We also suggest reference to buried archaeology given the former non-conformist chapel on the site.</p>	<p>Comprehensive explanation of Heritage significance is welcomed.</p> <p>It is thought that references to St. Andrews Street may be a mistake, should this refer to St George's Street instead?</p>	<p>Heritage policy wording strengthened.</p> <p>Archaeological assessment requirement added</p>
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		<p>also characterised by relatively modest, pitched roofed development, both historic (including the grade II listed numbers 22-25 and later infill matching it. This street marks the point at which the character of historic development changes. The western side of St Andrew's Street features a former 19th century factory building filling a corner plot on Colegate. This is similar in form, though smaller than the 19th century Art College building across the river to the south. Upstream from the college is modern development of a similar scale. St Andrew's Street can therefore be seen as a 'hinge' point in this part of the conservation area and the application site being to the east of it falls within the area characterised by more domestic scale development, both old and new. Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings.</p> <p>We consider that there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. This should be reflected in the policy.</p> <p>We welcome reference to the Conservation Area and heritage assets and their settings in bullet point 1</p>			
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		<p>although again suggest that the wording is slightly amended to include the word significance. The site itself also formerly contained a non-conformist chapel dating from the 18th century. The impact on buried archaeology of the development will need to be given full consideration.</p> <p>Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale, grain and massing in policy. We also suggest reference to buried archaeology given the former non-conformist chapel on the site.</p>			
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficient design wording (compared to other proposed site allocation policies)	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2164 Land west of Eastgate House, Thorpe Road, Norwich. (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Lanpro on behalf of the landowners	Support	As noted in the representation the site has been subject to a planning application and approval at planning committee (ref:16/01889/O). The site is available and has been found to be suitable and appropriate for a development in the region of 20 homes through the planning process. The landowner is fully supportive of this site being allocated for the proposed development.	No issues requiring investigation	Support welcomed	No change
Historic England	Support	This site lies just outside of the Thorpe Ridge Conservation Area. Any development of the site therefore has the potential to impact upon the setting of the Conservation Area.	No issues requiring investigation	Support welcomed	No change

		We welcome the reference to the Conservation Area in the policy.			
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficiency policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3053 Land at Carrow Works, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	6
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 4 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of public	Support	<p>The site has not previously been promoted for redevelopment for other purposes because it was an operational industrial site. There is a pressing need for new housing in Norwich and this brownfield site is ideally situated to make a significant contribution in a sustainable location which could lead to substantial townscape and access benefits.</p> <p>The council's affordable housing policy seeks 33% provision but many housing schemes are contending that the provision of affordable housing is not viable. A</p>	<p>Viability of Affordable Housing provision at 33%?</p> <p>Potential for a significant new quarter of Norwich in a sustainable location.</p>	Affordable Housing policy dealt with in Strategy – not duplicated in site specific allocation policies to be consistent throughout hierarchy.	Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.

		<p>scheme will need to be subject to a viability assessment.</p> <p>The site benefits from substantial heritage significance and a riverside location, there is an opportunity to create a whole new quarter around the heritage and open space assets.</p>			
Historic England	Object	<p>Part of this 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 this site has the potential to affect these designated heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. There is however currently no mention of these heritage assets in either the policy or supporting text. We therefore suggest the inclusion</p>	<p>Suggested Changes: We suggest the inclusion of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting). We 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</p>	<p>Heritage context is welcomed and needs to be addressed in policy.</p> <p>Comprehensive masterplanning relating to the East Norwich Regeneration area is in its early stages. This work shall provide a basis for developing this policy.</p>	Heritage wording strengthened.

		<p>of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p> <p>We suggest that open space be provided between the Abbey and the river to reconnect the Abbey to the river and to enhance the setting of the abbey.</p> <p>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. In particular we question the capacity of the site.</p> <p>We 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 inform the extent of the developable area (and hence capacity 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</p>	<p>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.</p>		
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		should then inform the policy wording.			
Fuel Properties Ltd	Comment	<p>I am supportive of this residential led allocation and its importance in unlocking the ENSRA. It has the capacity to deliver a significant number of affordable units alongside other uses which will result in a balanced and vibrant community, however , this must be balanced with delivery which relies on commercial viability.</p> <p>The delivery of homes within this allocation should not be disadvantaged by a "blind 33%" affordable housing contribution without regard to other affordable housing policies particularly with regard to encouraging brownfield development, CIL contributions, social value and community benefits.</p>	Affordable Housing provision at 33% risks disadvantaging viable development being delivered on this brownfield site?	Affordable Housing policy dealt with in Strategy – not duplicated in site specific allocation policies to be consistent throughout hierarchy.	Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficiency policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change

<p>Environment Agency (Eastern Region)</p>	<p>Comment</p>	<p>We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and secondly any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>GNLP3053 The vast majority of the site is Flood Zone 1. There is a very small area to the north east of the site, adjacent to the river which is Flood Zone 3 now and in the future. Therefore the sequential approach must be applied to avoid built development within this small area of flood zone to allow it to continue to provide flood storage.</p> <p>The proposed bridge will need to be designed to be above the 1% flood level including 35% climate change to ensure that it does not obstruct flood flows or increase flood risk elsewhere. A Flood Risk Activity Permit must be obtained for the</p>	<p>Need for SuDS to protect water quality of river Wensum & take opportunities to improve riparian habitat.</p> <p>Development should be sequentially located to areas of the site in Flood Zone 1</p> <p>Requirements relating to proposed bridge.</p>	<p>Policy wording to be reviewed, site subject to Level 2 SFRA</p>	<p>Recommendations/advice added to policy supporting notes</p>
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		proposed bridge and any works within 8m of the main river Yare.			
Broads Authority	Comment	<ul style="list-style-type: none"> • Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'. • Could it make the most of its riverside location? • Bullet point 1 – last part refers to not prejudice future development of or restrict options for the adjoining sites. But the Utilities site is over the river, so not adjoining. Should the policy refer to the Utilities site in this sentence as well? • Is the scheme expected to provide the walkway/cycleway and to what standard? • There appears to be little mention of designated heritage assets and there are a number on site / 	<p>Affordable housing policy & wording to be reviewed</p> <p>Potential for enhancement of riverside location to be explored, including walkway/cycleway</p> <p>Wording relating to East Norwich sites/adjoining sites to be reviewed and clarified</p> <p>Conservation area and other heritage assets to be detailed in policy</p>	<p>Policy wording to be developed, informed by ongoing East Norwich masterplan work.</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Landscaping & riverside wording strengthened</p> <p>Utilities site referenced</p> <p>Heritage policy wording strengthened</p>

		<p>immediately adjacent, including the scheduled and highly graded Carrow Priory, listed former industrial buildings and Carrow House on King Street and the site is within the Bracondale CA</p>			
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FOOTNOTE

Please note that individual policies GNLP0360 (The Deal Ground), GNLP3053 (Carrow Works), and R10 (Utilities site) have now been combined into a single East Norwich Strategic Regeneration area strategic policy reference: GNLP0360/3053/R10

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3054 The site at St Mary's Works and St Mary's House, Norwich (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Lanpro Services Ltd for Our Place	Support	<p>The site owner Our Place, is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be a deliverable and suitable site for mixed use development that can come forward within the plan period to 2038.</p> <p>In light of potential fluctuations in market conditions and noting the lack of viability or deliverability evidence supporting the draft plan, they question the justification for the quantum specified within draft allocation GNLP 3054. They respectfully request that the wording be updated to ensure flexibility, such that it promotes and does not</p>	<p>Flexibility of quantum of units</p> <p>Flexibility in type of residential units</p> <p>Flexibility in mix of other uses on site</p> <p>Flexible approach to heritage assets and existing building use in redevelopment.</p> <p>Justification, evidence & flexibility relating to</p>	Policy to be reviewed and amended as necessary.	<p>Type of residential not explicitly specified in policy.</p> <p>Other uses not considered to be restrictive in policy wording.</p> <p>Reduction in weight of approach to heritage assets not supported.</p> <p>Affordable housing dealt with in</p>

		constrain the scale, form, mix and timing of the site's future development.	viability to ensure a deliverable scheme.		strategic policy 5 – not repeated in site specific policies.
Historic England	Object	<p>This site is located within the City Centre Conservation Area. There are a number of listed buildings nearby including St Mary's Church and St Martin at Oak Church, both listed at grade I, and Folly House and Pineapple House listed at grade II.</p> <p>We welcome reference to the City Centre Conservation Area listed buildings and locally listed buildings within the bullet points.</p> <p>We recognise that this site is suitable for redevelopment, but any such development must be of an appropriate design, scale and massing given the sensitivity of this location in heritage terms, between two grade I listed churches.</p> <p>To that end we suggest that we suggest that a more detailed Heritage Impact Assessment be undertaken.</p> <p>We understand that this site has planning consent which broadly established the scale of development for the site.</p> <p>Suggested Change:</p>	<p>Greater emphasis of heritage assets required in policy</p> <p>Suggested detailed Heritage Impact Assessment is undertaken</p>	Policy to be reviewed and amended as necessary.	Heritage assets wording strengthened.

		We suggest that a more detailed Heritage Impact Assessment be undertaken.			
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Appropriateness / necessity of repeating strategic policy requirements	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

Norwich – Carried Forward Allocations

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC3 10 – 14 Ber Street, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>Site impacts a number of heritage assets & their settings.</p> <p>No reference to City Centre Conservation Area or nearby listed buildings.</p> <p>there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. The scale of any new development should reflect that of the neighbouring properties</p>	Reference to heritage assets required in policy	Noted,	Wording of policy strengthened to address heritage assets, scale and grain of new development.

		<p>We suggest the inclusion of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p> <p>We also suggest amending bullet point 3 with the addition of the words 'and the scale of any new development should reflect that of the neighbouring properties.</p>			
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Water efficiency wording absent from policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. No change</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC4a Land at Rose Lane/Mountergate (Mountergate West), Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and is close to a number of listed buildings including Norwich Castle (which is also scheduled).</p> <p>Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings.</p> <p>The policy refers to on site listed buildings although to our knowledge there are no listed buildings actually on site (perhaps there may be some locally listed). There are however nearby listed buildings. Welcome bullet points 3 and 4.</p> <p>Suggested Change:</p>	Mistaken reference to Listed Buildings on site – HE doubt this.	Noted, Check HE List for clarification	wording of bullet point 4 updated/corrected to refer to adjacent rather than on-site

		Amend bullet point 4 unless there are actually listed buildings within the site boundary.			
Anglian Water Services Ltd.	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Water efficiency wording absent from policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.	Repetition of strategic policy 2 - -not to be included in site specific policy. No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC4b Land Mountergate/Prince of Wales Road (Mountergate East), Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	4
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Savills for Whitbread PLC	Support	Support – subject to suggested changes: <ul style="list-style-type: none"> • Bullet 1, change central to western • Bullet 2: add C2 use class, remove ‘educational facilities’ • Bullet 5: Baltic house in separate ownership, redevelopment would not prejudice this coming forward separately. • Bullet 8 relates to the retention and provision of public access to the currently private garden at the rear of Nelson Hotel. We request that this bullet point should be removed. The reason for this, is that as part of any redevelopment scheme, this open space will be re-provided, and therefore the 	Review location of heritage assets & amend wording as necessary Review use classes & amend if appropriate Review open space & amend if necessary Consider additional detail regarding landmark building.	Noted, comments to be reviewed as part of policy review prior to Regulation 19	Central amended to western C2 use class in this location adjacent to LNAZ is not considered appropriate policy requirement. Educational facilities relate to existing school on site – no change Night time uses omitted as outside LNAZ & revision to

		<p>word 'retention' does not work in this regard. Furthermore, any future open space would not be solely associated as a private garden to the Nelson Hotel.</p> <p>Finally, in respect of the provision of future open space, we consider that Bullet Point 7 covers this requirement</p> <p>Request additional bullet point added to provide for a landmark building to the site: <i>"Given the size and location of the site, it is considered that the site has potential to accommodate landmark buildings and to deliver a comprehensive high quality mixed use new community"</i></p>			<p>Strategic policy 7.1 relating to night time economy.</p> <p>The space whatever its precise current function is designated greenspace and makes a significant contribution to the conservation area and the river corridor. New development must enhance this benefit and the space should be public.</p> <p>Landmark building suggests inappropriate scale for this location and is not supported (landmark building policy removed from strategy)</p>
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					policy 7.1), however wording added regarding noteworthy design to reflect sites location in proximity to train station and sense of arrival to city
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Water efficiency wording absent from policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.	Repetition of strategic policy 2 – not to be included in site specific policy. No change
Historic England	Comment	Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings. We welcome bullet points 3, 4 and 5 that reflect these heritage assets.	Impact of proposed development on heritage assets addressed in policy.	Noted	No change
Broads Authority	Comment	Could it make the most of its riverside location?	Potential for enhancement of riverside location	Noted	Policy wording to be reviewed & added as necessary

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC7 Hobrough Lane, King Street, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	This site lies within the Norwich City Centre Conservation Area and includes grade II listed buildings (125-129 King Street). Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings. We welcome bullet point 3 which refers to the Conservation Area and these listed buildings and bullet point 5 in relation to heritage interpretation.	Heritage impacts highlighted	Noted	No change
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Water efficiency wording absent from policy - Appropriateness / necessity of repeating	Representation refers to student accommodation, this site has not been allocated for	Repetition of strategic policy 2 – not to be included in site specific policy.

			strategic policy requirements in site specific policies	student accommodation; Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.	
Broads Authority	Comment	<ul style="list-style-type: none"> • Could it make the most of its riverside location? • Bold text uses the word ‘should’ when referring to affordable housing level. But the later bullet points are introduced as ‘will achieve’. The word should seems to weaken the requirement. CC4b, for example, does not mention ‘should’ indeed GNLP0312 is firmer saying ‘will’. • Unlike other policies with a waterside frontage, the following wording is missing. Why is that? Could/should it be added? <ul style="list-style-type: none"> o A scale and form which respects and takes advantage of its riverside context, o High quality landscaping, planting and biodiversity enhancements particularly along the river edge; o Protection of bankside access for maintenance purposes. 	<p>Potential for enhancement of riverside setting</p> <p>Ambiguous wording of Affordable Housing policy</p> <p>Missing wording/detail relating to waterside site compared to similar sites.</p>	Noted, wording to be reviewed and updated as necessary	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Waterside wording added</p> <p>Design points added to policy</p> <p>Bankside protection requirement added to policy</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC8 King Street Stores, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	4
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and is adjacent to the grade II listed Ferryboat Inn. Any development of the site therefore has the potential to impact upon the conservation area and the setting of the adjacent listed building. We welcome bullet points 1 and 2 that refer to heritage assets. and the need to retain the locally listed building on site. We consider that there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. We suggest that specific mention is made of the grade II listed Ferryboat Inn in the policy.</p> <p>Suggested Change:</p>	<p>Support retention of locally listed building</p> <p>Concern regarding appropriate scale and grain of development</p> <p>Suggest specific mention of adjacent grade 2 listed building.</p>	<p>Points regarding heritage assets, scale and form of proposed development noted & to be addressed.</p> <p>Issues relating to the Locally Listed building & the constraints placed on the site & tension with other aspects of the policy which need to be explored in more detail.</p>	<p>Heritage considerations strengthened in policy wording with specific reference to heritage assets.</p>

		<p>We suggest that specific mention is made of the grade II listed Ferryboat Inn in the policy.</p> <p>Mention should also be made in the policy of the need for appropriate massing and height on this site.</p>			
Hurlingham Capital / Lanpro	Comment	<p>Comments cover 4 key points:</p> <ul style="list-style-type: none"> • Aspects around retention of locally listed building • Provision of riverside walk/access to river (including tension with retaining locally listed building). Reinstatement of historic building line to King Street/Loss of trees • Approach to Affordable Housing • Policy Subtext 	<p>Concern is raised that retention of the locally listed building may not be viable over the plan period – also that retention of the building conflicts with the requirement to provide riverside walk.</p> <p>Reinstatement of the historic building line will necessitate removal of trees, this needs to be addressed in the policy.</p> <p>Policy subtext from existing adopted policy CC8 is absent from the GNLP, it is felt that this supporting text is beneficial to the policy</p>	<p>The points raised are useful in the assessment of this site and the wording/requirements of the policy. This will need to be subject of further detailed discussion and assessment to refine the requirements to enable an appropriate policy for deliverable development.</p>	<p>Retention & preservation of locally listed building considered a key starting point for any scheme on this site.</p> <p>Conflict between restored building line/trees addressed in revised policy wording</p> <p>Approach to Riverside walk amended in policy</p> <p>Supporting text added</p>

			& should be carried into GNLP		
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Noted. This site has not been allocated for student accommodation Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change
Broads Authority	Comment	<ul style="list-style-type: none"> • Bold text uses the word ‘should’ when referring to affordable housing level. But the later bullet points are introduced as ‘will achieve’. The word should seems to weaken the requirement. CC4b, for example, does not mention ‘should’ indeed GNLP0312 is firmer saying ‘will’. • Could it make the most of its riverside location? • Unlike other policies with a waterside frontage, the following wording is missing. Why is that? Could/should it be added? <ul style="list-style-type: none"> o A scale and form which respects and takes advantage of its riverside context, o High quality landscaping, planting and biodiversity enhancements particularly along the river edge; 	<p>Potential for enhancement of riverside setting</p> <p>Ambiguous wording of Affordable Housing policy</p> <p>Missing wording/detail relating to waterside site compared to similar sites.</p>	Noted, wording to be reviewed and updated as necessary	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Waterside frontage is occupied by existing locally listed buiding which is sought to be retained. Reference added to riverside bullet</p>

		o Protection of bankside access for maintenance purposes.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC10 Land at Garden Street and Rouen Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. Any development of the site therefore has the potential to impact upon the Conservation Area. There is currently no mention of the Conservation Area in the policy and supporting text.</p> <p>Suggested Change: We suggest the inclusion of wording referencing the Conservation Area and the need to preserve and enhance the significance of the Conservation Area</p>	Lack of reference to location within Conservation Area and the need to preserve and enhance the significance of the Conservation Area	Points regarding heritage assets, scale and form of proposed development noted & to be addressed.	Update policy to include appropriate references to location in Conservation area

Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Noted. This site has not been allocated for student accommodation, Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC11 Land at Argyle Street, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	This site lies within the Norwich City Centre Conservation Area and adjacent to the grade II listed Remains of St Peter Southgate Church. Any development of the site therefore has the potential to impact upon the	Suggested inclusion of wording referencing the Conservation Area and specifically referencing the remains of St Peter Southgate church	Points regarding heritage assets, scale and form of proposed development noted & to be addressed.	Policy wording updated to be strengthened with reference to heritage assets

		<p>Conservation Area and listed building and their settings. There is currently no mention of the Conservation Area in the policy and supporting text. Although bullet point 1 refers to neighbouring listed and locally listed buildings, it would be helpful if the grade II listed building was referenced by name.</p> <p>Suggested Change: We suggest the inclusion of wording referencing the Conservation Area and specifically referencing the remains of St Peter Southgate church (grade II listed) and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p>	<p>(grade II listed) and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p>		
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC16 Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	4
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNL RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells	Support	<p>Bidwells strongly support the allocation of land adjoining Norwich City Football Club for mixed use development, including a minimum of 270 homes. The site is considered to be entirely deliverable, and capable of making a significant contribution towards the need for additional leisure, community, residential, community, retail and office uses in the Greater Norwich Area during the period to 2038.</p> <p>Whilst future connectivity with the East Norwich area is a key objective, the development of the site is not dependent on the regeneration of the wider area; 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 delay the delivery of Site Reference CC16. On this basis, a few minor alterations are proposed to the policy.</p>	<p>Support objective of connectivity with east Norwich, but concern regarding tying development to wider east Norwich regeneration too closely may limit development coming forward on CC16.</p> <p>Requirement for provision of public transport interchange on site could be unreasonable & disproportionate.</p>	Public transport interchange requirement is a requirement of the existing allocation, this is a long term objective in this location.	No change

		<p>The principal change relates to the removal of the need to provide a public transport interchange on site, together with a public transport strategy for the wider east Norwich strategic regeneration area. (Unnecessary & may render site unviable)</p> <p>Policy proposal requiring public transport strategy for wider east Norwich strategic regeneration are – this site can be developed independently & should not rely upon wider regeneration, this could be unreasonable & disproportionate</p> <p>Notwithstanding the foregoing, to ensure that the development of site allocation CC16 facilitates both pedestrian and public transport accessibility to the Norwich East area, it is recognised that any proposal must demonstrate how it would facilitate future links with the adjacent site.</p>			
Historic England	Object	<p>There are no designated heritage assets within the site boundary but the Bracondale Conservation Area lies to the south west of the site. Carrow Priory (scheduled and listed also lies to the south of the site. Any development of the site therefore has the potential to impact upon the setting of the Conservation Area and the Abbey site. We welcome the reference to the Bracondale Conservation Area in the policy but suggest that mention is also made of Carrow Priory.</p> <p>Suggested Change:</p>	<p>No reference to adjacent statutory listed building: suggest the inclusion of wording referencing Carrow Priory and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting)</p>	<p>Points regarding heritage assets, scale and form of proposed development noted & to be addressed.</p>	<p>Conservation area & heritage asset wording strengthened</p>

		We suggest the inclusion of wording referencing Carrow Priory and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).			
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome inclusion of water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted
Broads Authority	Comment	<ul style="list-style-type: none"> • Bold text uses the word ‘should’ when referring to affordable housing level. But the later bullet points are introduced as ‘will achieve’. The word should seems to weaken the requirement. CC4b, for example, does not mention ‘should’ indeed GNLP0312 is firmer saying ‘will’. • Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document? • Where it says ‘respect its riverside location’ what does that mean? Could it make the most of its riverside location? • Is the scheme expected to provide the walkway/cycleway and to what standard? • Reference is made to the Bracondale Conservation Area but there are Heritage Assets in the vicinity, including the schedule Boom Towers and I think listed buildings on the Carrow Works site / Papermills Yard site. 	<p>Ambiguous wording to Affordable housing policy.</p> <p>Clarification required regarding water and energy efficiency policy.</p> <p>Clarification of approach to riverside location and requirements relating to riverside walk.</p> <p>Provide reference to adjacent heritage assets.</p>	Noted, policy wording to be reviewed	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Energy and water omitted – contained in policy 2</p> <p>Heritage asset wording strengthened in policy with direct reference to assets included</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC18 Land at 140-154 Oak Street and 70-72 Sussex Street, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and the grade II listed Great Hall lies to the north west of the site.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings.</p> <p>We welcome the reference in the policy to the Conservation Area but suggest the policy should also reference the nearby grade II listed Great Hall.</p> <p>Suggested Change: We suggest the inclusion of wording referencing the grade II listed Great Hall and the need to preserve and enhance the significance of these assets</p>	<p>Absence of reference to nearby statutory listed building.</p> <p>Suggested wording for inclusion in policy.</p>	<p>Points regarding heritage assets, scale and form of proposed development noted & to be addressed.</p>	<p>Heritage wording strengthened – explicit reference to great hall included in policy</p>

		(including any contribution made to that significance by setting).			
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC24 Land to rear of City Hall, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	This site lies within the Norwich City Centre Conservation Area and adjacent to the grade II * listed City Hall, 13-17 St Giles Street, also listed at II* and a number of grade II listed buildings. Any development of the highly sensitive site therefore has the potential to impact	Concern relating to scale and height of proposed development – should set maximum height to the same as City Hall	Comments relating to scale accepted	Reference to scale in context of City Hall added to policy wording

		<p>upon these heritage assets and their settings. We therefore welcome bullet points 1 and 2 of the policy. The scale and height are crucial in this context. The maximum height should be the same as City Hall.</p> <p>Suggested Change: Add in reference to maximum height to be the same as City Hall.</p>			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Welcome reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site CC30 Westwick Street Car Park, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 2 Comment (2 comments are both from Anglian Water – same representation submitted twice)

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. The grade II listed pump house lies to the south east of the site and the site forms part of the setting of the City Wall.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We welcome the inclusion of bullet points 1 and 4 in the policy. There are issues of scale and massing and views into the Conservation Area. These should also be highlighted in the policy.</p> <p>Suggested Change: The grade II listed pump house should also be referenced in the policy. There</p>	Absence of reference to nearby heritage assets – suggested wording provided	Points regarding heritage assets, scale and form of proposed development noted & to be addressed.	Heritage wording strengthened

		are issues of scale and massing and views into the Conservation Area. These should also be highlighted in the policy.			
Anglian Water Services Ltd. (Submitted twice)	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R1 Land at The Neatmarket, Hall Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design in policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R2 Ipswich Road Community Hub, 120 Ipswich Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
NPS Property Consultants Ltd for Norfolk County Council	Support	<p>Norfolk County Council (NCC) own the site and they remain committed to bringing this site forward for a high quality well designed development if the current NCC Adult Service user requirement ends.</p> <p>Deliverability evidence is provided in representation.</p> <p>Following the cessation of the use of the site by NCC Adult Services, the site will be developed following the grant of planning permission. It is anticipate that development will commence in the next 5 years.</p> <p>The availability of services is unlikely to result in significant costs to prevent the timely development of this site; however,</p>		Support welcomed	No change

		<p>the brownfield nature of the site may raise ground condition issue (and abnormal costs).</p> <p>As a result, at this stage, the landowner is committed to deliver policy compliant affordable housing (at 28%) and unless unforeseen ground condition remediation costs are identified, it is anticipated that all the requirements of policy R2 will be met.</p> <p>The detailed design will take advantage of the gateway position to deliver a distinctive design, well related to the woodland, using construction techniques to mitigate any challenges presented by ground conditions, with good pedestrian access through the site and linking to facilities locally.</p>			
Anglian Water Services Ltd.	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R7 John Youngs Limited, 24 City Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	Whilst there are no designated heritage assets within this site, the grade II listed Church of St Mark lies to the south of the site. Any development of the site therefore has the potential to impact upon the setting of the church. We welcome reference in bullet point 2 of the policy to the church and the locally listed residential terraces.		Support welcomed	No change
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R10 Utilities site, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 0 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Firstplan for National Grid and RWE Generation UK plc	Support	The Utilities Site is not only critical to the delivery of the May Gurney and Deal Ground site but also represents an opportunity to deliver much needed development and associated benefits in its own right. NG and RWE are therefore pleased that the Utilities Site continues to be carried forward as a site allocation in the Greater Norwich Local Plan (GNLP) in recognition of its role as a key catalyst to regeneration in the East Norwich Regeneration Area. These representations are therefore submitted in support of the continuing allocation and in the interest of ensuring that development density can be maximised, in accordance with national planning policy objectives.	<p>Important component in delivery of East Norwich Regeneration area</p> <p>Site has potential to deliver higher level of housing (at higher density) than proposed in the draft allocation.</p> <p>Affordable Housing approach requires review with more detailed site specific viability assessment.</p>	<p>Acknowledge & agree that R10 Utilities site is an important component in delivery of East Norwich regeneration area.</p> <p>It is acknowledged that R10 may have the capacity to accommodate a higher density of development than the 100 units noted in the policy; comparison with</p>	<p>Flexibility in housing numbers to facilitate higher densities if evidenced through masterplanning process.</p> <p>Affordable Housing dealt with in strategic policy 5 rather than in site specific allocation policies</p> <p>No change regarding energy provision in supporting notes</p>

		<p>The Utilities Site is allocated in the Broads Authority Local Plan (2019) as Policy NOR1. The site is recognised for its potential contribution to the strategic needs of the wider Norwich area. The site is allocated for mixed-use development which could include around 120 dwellings in the Broads Authority portion of the site.</p> <p>The adopted Norwich Local Plan prescribes a minimum of 100 dwellings, whilst The Broads identifies capacity of approximately 120 dwellings. These figures combined would result in the residential element of the scheme delivering a density of approximately 35 dwellings per hectare (dph) across the site, with a density of only 14.5 dph on the Norwich portion of the site. Assuming 35 dph across the complete site this equates to 385 dwellings, which based on all other information set out herein, seems a sensible and deliverable target. Greater capacity has been demonstrated in previous planning application by third party.</p> <p>28% affordable housing provision: There are many costs associated with delivering development at the site,</p>	<p>Land owners do not consider delivery of a new energy plant on this site to be deliverable – suggest removal from policy requirements</p> <p>continue to support the reference in the draft allocation to providing an enhanced, integrated access and transportation strategy. Likewise, there is support for the continued promotion of use of the River Wensum</p> <p>The Utilities site is cleared, available, suitable and deliverable for development now, and certainly within years 0-5 of the plan, subject to the determination and implementation of suitable access arrangement.</p>	<p>the area of the site covered by Broads Authority allocation NOR1 is helpful, however the Norwich City Council area is more constrained with a larger area within flood zones 2 and 3 – as such applying a gross densities across the whole site is not evidenced. Densities and developable area shall be explored in detail as part of the ongoing East Norwich Masterplan work, achieving an efficient and sustainable use of land is a priority.</p> <p>Concerns regarding viability and affordable housing requirements</p>	
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		<p>having regard to the historic uses and the site constraints which, rightly, the council has already identified. On this basis, this is something that would need to be considered further, with specific regard to the viability of any proposal that should materialise.</p> <p>Also of relevance is the change in circumstances around the need for, and indeed deliverability of, the new energy plant referenced in the adopted and draft allocation. RWE has considered this in detail, however, the National Grid connection costs have been demonstrated to be prohibitively expensive in development viability terms in this location. So, whilst this reference to the site's historic 'utility' use is noted, and is not specifically resisted by the landowners, officers should be aware that this is no longer deemed possible.</p> <p>Instead, direct connections could be made to the grid as required and further discussion should take place in this regard. The upshot of this is the ability to deliver a greater number of residential units or alternative floorspace with fewer viability and space constraints.</p>	<p>The landowners acknowledge that there are access and infrastructure matters still to be resolved throughout the East Norwich Regeneration Area, however, the draft allocation should be updated to allow sufficient flexibility for the delivery of a suited mix of uses and higher density of residential development across the Utilities Site in order to respond to changing requirements, viability constraints and suitability/availability of the site.</p>	<p>acknowledged. Affordable housing policy dealt with in strategic policy 5 and not in individual site allocation policies.</p> <p>The policy does not explicitly call for development of a new energy plant. The accompanying notes reference the strategic policy expectation for exploration of provision of a local energy network in the East Norwich Regeneration area. This will be explored further as part of the ongoing Master planning process and will assist in informing housing numbers / uses on this site.</p>	
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		<p>continue to support the reference in the draft allocation to providing an enhanced, integrated access and transportation strategy. Likewise, there is support for the continued promotion of use of the River Wensum for moorings(only) to the southern side of the utilities site, and indeed the enhanced use of the river for freight, passenger and recreational use.</p> <p>Deal Ground's outline permission also allowed for 670 new residential units spread across the portion of land to the south of the River Wensum, including the May Gurney allocation. These combined numbers still leave a significant shortfall to the targeted 2000 minimum units for this strategic area, signifying the need to see increased deliverability elsewhere, where land is suitable and available, in the regeneration area.</p> <p>The Utilities site is cleared, available, suitable and deliverable for development now, and certainly within years 0-5 of the plan, subject to the determination and implementation of suitable access arrangement. This does rely on joint-up discussions and progression, but the landowners, and indeed potential</p>		<p>Support for enhanced, integrated access and transportation strategy, River Wensum strategy, and enhanced use of river welcomed.</p> <p>This policy does not seek to pre-empt the outcomes of the East Norwich Regeneration master plan, but to support its production.</p> <p>Approach to joined-up working acknowledged and appreciated. Deliverability information welcomed.</p>	
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		<p>purchasers, are keen to explore the opportunities for the site to progress alongside the plan making process to ensure that the site does not stagnate whilst others refine their approach.</p> <p>The landowners acknowledge that there are access and infrastructure matters still to be resolved throughout the East Norwich Regeneration Area, however, the draft allocation should be updated to allow sufficient flexibility for the delivery of a suited mix of uses and higher density of residential development across the Utilities Site in order to respond to changing requirements, viability constraints and suitability/availability of the site.</p>			
Historic England	Support	Whilst there are no designated heritage assets within the site boundary, we welcome bullet point 6 that references the heritage significance of the site.	Support for reference noted.	Support welcomed	No change
Member of Public	Comment	The development of the Utilities site is still designated, in part, for energy generation. The collapse of the proposed Generation Park project on this site demonstrates the dangers of infrastructure projects of this size, based on unproven technologies and wholly dependent on government subsidies that can be withdrawn at any time. Norwich almost ended up with an outdated,	Any future energy producing developments should be of a manageable scale, using proven technology and be truly green, i.e. not adding further emissions to Norwich's	The policy does not explicitly call for energy generation in the same way as the existing allocation.	Energy provision covered in strategic policy 4. No change to site specific policy

		polluting and uneconomic white elephant on its eastern fringe. Any future energy producing developments should be of a manageable scale, using proven technology and be truly green, i.e. not adding further emissions to Norwich's already sub-standard air quality.	already sub-standard air quality		
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Absence of water efficient design from policy.</p> <p>Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy.</p>
Broads Authority	Comment	<p>Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b for example does not mention 'should' indeed GNL0312 is firmer saying 'will'.</p> <p>Could it make the most of its riverside location?</p> <p>Bullet point 2 - implies the walkway/cycleway will be provided as part of the scheme – but other policies are not that clear. But then it says</p>	<p>Affordable housing policy wording is ambiguous and requires strengthening</p> <p>Potential to enhance riverside location needs exploring</p> <p>Greater clarity/detail required for walkway/cycleway.</p>	<p>Affordable housing wording referred to policy 5, subject to viability considerations where appropriate.</p> <p>Reference to making the most of riverside location to be included.</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Riverside wording amended.</p>

		'should' (which 0068 equivalent bullet point does not include) link to a future extension? This may need clarifying. Is the scheme expected to provide the walkway/cycleway and to what standard?		Riverside walk wording strengthened	
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FOOTNOTE

Please note that individual policies GNLP0360 (The Deal Ground), GNLP3053 (Carrow Works), and R10 (Utilities site) have now been combined into a single East Norwich Strategic Regeneration area strategic policy reference: GNLP0360/3053/R10

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R13 Site of former Gas Holder at Gas Hill, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, the site lies immediately adjacent to the Thorpe Hamlet Conservation Area and close to the scheduled remains of St Leonards Priory. The site lies on rising ground, opposite Cathedral Close across the river. There are also two nearby grade II listed buildings, Bridge House PH and Chalk Hill House. The City Centre Conservation Area lies nearby.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We accept the principle of development but massing and height will be important considerations. We would expect</p>	<p>Reference should be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.</p> <p>Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.</p>	Points regarding heritage assets, scale and form of proposed development noted & to be addressed.	policy wording updated to address specific heritage assets

		<p>development to blend in with the existing pattern of development. This should be included in the policy.</p> <p>We welcome the inclusion of bullet point 2 in the policy but 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.</p> <p>Suggested Change: 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. Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.</p>			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy .	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R14/R15 Land at Ketts Hill and east of Bishop Bridge Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	Whilst there are no designated heritage assets within the site boundary, the site lies immediately adjacent to the Thorpe Hamlet Conservation Area. The scheduled Blockhouse known as the Cow Tower lies to the west of the site, as does the City Centre Conservation Area. Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We accept the principle of development but massing and height will be important considerations. We would expect development to blend in with the existing pattern of development. This should be included in the policy. We welcome the inclusion of bullet point 2 in the policy but suggest that reference	Reference to proximity to heritage assets including City Centre Conservation Area Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.	Points regarding heritage assets, scale and form of proposed development noted & to be addressed.	Heritage wording strengthened

		<p>should also be made to the City Centre Conservation Area and the nearby Cow Tower a scheduled monument.</p> <p>Suggested Change: Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.</p>			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.
Member of public	Comment	<p>Development of the R14/15 site should include direct access to the open space amenity of Kett's Heights which is directly adjacent to the east of the site. This open space area is owned by the City Council and actively managed by a community volunteer group 'Friends of Kett's Heights'. At the moment the site has only one access point on Kett's Hill and there is a strong feeling in the community that a second entrance would increase the use of the site. If such an entrance were to be made from a new housing development in R14/R15 then it would almost certainly need to be</p>	Additional access to Kett's Heights	Opportunity for access accepted, possibilities for additional access to be explored	Supporting text updated to explore opportunities for additional access to Kett's Heights through allocation site.

		stepped because of the steepness of the terrain.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R17 Site of former Van Dal Shoes, Dibden Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	We welcome the reference to the locally listed shoe factory building in the policy.		Support welcomed	No change
Lanpro on behalf of Van Dal Footwear Ltd.	Comment	The Locally Listed status of the former shoe factory is contested (with some evidence provided to support this position) as such the requirement for retention of the existing building is also contested. The approach to strategic views is contested and alternative approach is suggested.	Heritage asset status Affordable housing viability Density of housing units Repetition of strategy policies that are not site specific or based on site specific evidence.	Support for the proposed allocation is welcomed. Additional details to be reviewed and addressed in policy wording as appropriate.	Preference for Locally listed building to be reused – options subject to viability & assessment already included in policy to be explored at Planning application stage – No change

		<p>Bullet point 2 repeats policies in the strategy are not site specific & should be removed.</p> <p>The approach to affordable housing is not site specific and is not based on viability evidence.</p> <p>The density is too low for the site and should be reviewed – this point is based on pre-app discussions with Norwich City Council.</p>	<p>Inappropriate policy relating to views</p>		<p>Objection to strategic views accepted and amended in policy requirements.</p> <p>energy and water references omitted from bullet 2.</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Increased densities have not been demonstrated and agreed with Norwich City Council to date. The policy requirement is consistent with existing adopted policy & density requirements in strategic policy 2. – No Change</p>
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<p>Anglian Water Services Ltd</p>	<p>Comment</p>	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.</p>
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R18 Site of former Start Rite Factory, 28 Mousehold Lane, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R19 Land north of Windmill Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R20 Land east of Starling Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	<p>Whilst there are no designated heritage assets within the site boundary, this site lies close to the edge of the City Centre Conservation Area. Any development of the site therefore has the potential to impact upon this heritage asset and its setting.</p> <p>We therefore welcome bullet point 2 of the policy that references the Conservation Area and locally listed terraces.</p>		Support welcomed	No change
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

			requirements in site specific policies	to include it in the allocation policy	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R30 Land at Holt Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Absence of reference to water efficient design. Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R31 Heigham Water Treatment Works, Waterworks Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Anglian Water Services Ltd	Support	<p>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.</p> <p>Savills will be making a separate response in relation to the above site on behalf of Anglian Water.</p>	No issues requiring investigation	Support welcomed	No change
Savills UK Ltd	Support	The site is owned by Anglian Water and is located within the urban area of Norwich. This site is allocated in the adopted Local Plan also as site R31. This site has been carried forward and is	Allocation site reduced in size – reduction in proposed deliverable housing	Support welcomed, Reduction in developable site	Housing figures & site area/boundary revised.

		<p>allocated for a housing led mixed use development and open space. This site is in a sustainable location and makes use of previously developed land and therefore it should continue to be allocated in the new Local Plan.</p> <p>However, part of the site is now unavailable as 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 reduced to approximately 60 homes.</p> <p>The accompanying plan shows the remaining land that is now available and that can be developed over the plan period. We propose that the allocation is amended to this new boundary. The remaining site specific requirements are considered appropriate except for the one relating to:</p> <ul style="list-style-type: none"> • The land adjoining the River Wensum will provide a public open space with a publicly accessible riverside walk. This needs to be amended due to the enhanced security requirements now needed for the water 	<p>Publicly accessible space needs to be subject to Security considerations for Waterworks – this needs to be acknowledged in policy</p> <p>Continued support for allocation – at a lower level.</p>	<p>area acknowledged & will require amendment in the plan figures & associated mapping</p> <p>Security concerns acknowledged</p>	<p>Security related wording included in policy.</p> <p>Revised wording relating to on and off site heritage assets.</p>
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		<p>treatment site. It is proposed this criteria be amended to state: “The land adjoining the River Wensum will provide a public open space with a publicly accessible riverside walk subject to water security considerations.”</p> <p>In conclusion Anglian Water continues to support this allocation subject to the amendments suggested above.</p>			
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, St Bartholomew’s Church which is as scheduled monument and listed at grade II lies to the east of the site. Any development of the site therefore has the potential to impact upon these heritage assets and their settings. There is currently no mention of the church in the policy or supporting text. We welcome bullet point 2 and also the reference to the industrial garden.</p> <p>Suggested Change: Reference should be made in the policy and supporting text to the nearby St Bartholomew’s Church (grade II listed and a scheduled monument</p>	Reference should be made in the policy and supporting text to the nearby St Bartholomew’s Church (grade II listed and a scheduled monument	Requirement for additional heritage asset wording in policy including wider impacts noted. Reference to heritage assets to be included in policy	. Due to revised boundary references made to on and off site non-designated and designated heritage assets.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R33 Site of former Earl of Leicester Public House, 238 Dereham Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	Whilst there are no designated heritage assets on this site, the site lies adjacent to the Norwich City (Earlham Road) Cemetery which is a grade II Registered Park and Garden. Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We therefore welcome the reference in bullet point 1 to the Earlham Cemetery.		Support welcomed	No change
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R35 Land at Havers Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells for Dacre Property Holdings	Object	<p>Dacre Property Holdings wishes to withdraw their support for the continued residential allocation of this site.</p> <p>The site has been allocated in Norwich City Council's Adopted Local Plan for housing since 2014, and to date has not been brought forward. Dacre Property Holdings, who own the majority of the site, have extensively marketed their part of the site for residential redevelopment, with limited interest expressed by housebuilders/developers. No formal offers were received, but during discussions with one potential interested party, the value indicated was significantly lower than the site's current</p>	<p>Majority land owner no longer supports allocation of this site for residential development due to lack of viability & higher value in existing use.</p> <p>Suggest de-allocation</p>	Without support of the majority landowner this site cannot be evidenced as deliverable within the plan period, as such is no longer suitable for allocation.	Remove allocation

		<p>value as a commercial/industrial site. This is largely due to the site's sub-prime location within Norwich's housing market, as well as practical issues such as the potential for land contamination from previous uses and the proximity of the site to the river with associated issues of flood risk and drainage.</p> <p>Consequently, it would not be viable to develop the site for housing at the present time, and it is difficult to see how this will change significantly in the coming years. As the site is not considered viable, and is therefore not available for residential development, it does not meet the definitions of 'deliverable' or 'developable' contained in the National Planning Policy Framework (NPPF) glossary. Therefore, the housing allocation should not be taken forward in the Greater Norwich Local Plan, as it is not sound.</p>			
Anglian Water Services Limited	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Noted	Noted	Allocation to be removed

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R36 Mile Cross Depot, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	Whilst there are no designated heritage assets within the site boundary the Mile Cross Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact upon this heritage asset and its setting. We therefore welcome bullet point 1 of the policy that references the Conservation Area		Support welcomed	No change
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R37 The Norwich Community Hospital site, Bowthorpe Road, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary the site lies adjacent to the Norwich City (Earlham Road) Cemetery which is a grade II Registered Park and Garden as well as the Jewish Mortuary Chapel listed at Grade II.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings.</p> <p>We welcome the reference to Earlham Cemetery in bullet point 2. It would be helpful if the policy also reference the fact that the cemetery was a grade II Registered Park and Garden and also referred to the nearby Jewish Mortuary Chapel.</p>	It would be helpful if the policy also reference the fact that the cemetery was a grade II Registered Park and Garden and also referred to the nearby Jewish Mortuary Chapel.	Heritage impacts noted	Explicit reference to setting of adjacent heritage assets

		<p>Suggested Change: It would be helpful if the policy also reference the fact that the cemetery was a grade II Registered Park and Garden and also referred to the nearby Jewish Mortuary Chapel.</p>			
<p>Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.</p>

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R38 Three Score, Bowthorpe, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	Whilst there are no designated heritage assets within the site boundary the site lies immediately adjacent to the Bowthorpe Conservation Area and within the setting of Bowthorpe Hall (grade II listed). Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We therefore welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.		Support welcomed	No change
Anglian Water Services	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	No reference to water efficient design - Appropriateness / necessity of repeating strategic policy	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary	Repetition of strategic policy 2 – not to be included in site specific policy.

		Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	requirements in site specific policies	to include it in the allocation policy	No change
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site R42 Land west of Bluebell Road, and north of Daisy Hill Court/Coral Court, Westfield View, Norwich (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Historic England	Support	We welcome the reference to the Eaton Conservation Area in bullet point 1.		Support welcomed	No change
Member of Public	Support	Reluctantly I accept the need for extending the current development on this site given the fact that facilities have already been established there.		Comment noted	No change
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design - Appropriateness / necessity of repeating strategic policy	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

			requirements in site specific policies	to include it in the allocation policy	
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Norwich – Reasonable Alternative Sites

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0377 Land east of King Street (King Street Stores & Sports Hall site), Norwich (Reasonable Alternative Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Environment Agency (Eastern Region)	Comment	The very east of the site allocation, adjacent to the river, lies in the present and future Flood Zones 2 and 3. Therefore there should be no development within this small section of flood zones, and the development should be sequentially sited in Flood Zone 1. As with all development in Flood Zones, the development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000)	Site partially within flood zones 2 & 3, any development should be located within flood zone 1 area. Design to address flooding issues	Noted, this site is currently a reasonable alternative and shall be subject to a level 2 strategic flood risk assessment	Site not allocated – No change

		annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage.			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2137 Land at Riverside, Norwich (Reasonable Alternative Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 2 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Environment Agency (Eastern Region)	Comment	<p>We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and secondly any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>This site allocation lies mainly in Flood Zone 1 currently, with very small areas of Flood Zones 2 and 3 adjacent to the river. Once climate change is applied to the flood outlines, Flood Zones 2 and 3 extend further into the site. The development must be</p>	<p>SuDS design to protect water quality & riparian habitat.</p> <p>Any development of the site should be sequentially located in flood zone 1 where possible. If development is required in flood zones 2 and 3 – basic guidance is provided.</p> <p>The requirement to take account of the future flood risk on the site, and design</p>	Noted , this site is currently a reasonable alternative and is not allocated	No change

		<p>sequentially sited in future Flood Zone 1 where possible.</p> <p>If development is required to be sited within these future Flood Zone 3 (1% annual probability with 35% climate change) and Flood Zone 2 (0.1% annual probability with 35% climate change) flood outlines then the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change.</p> <p>The requirement to take account of the future flood risk on the site, and design the development to be safe and not increase flood risk elsewhere, as required in the NPPF, should be mentioned within the site allocation.</p>	<p>the development to be safe and not increase flood risk elsewhere, as required in the NPPF, should be mentioned within the site allocation.</p>		
Broads Authority	Comment	<p>I note this is a reasonable alternative. If this is taken forward then we would welcome wording that covers the issues addressed above.</p>		<p><i>It is not clear what is meant by this representation.</i></p>	<p>No change at present</p>

Norwich – Unreasonable Sites

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0133-F UEA – Land west of Bluebell Road, Norwich (Unreasonable Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of public	Support	I strongly wish to see preserved the current amenity this site represents, free of development.	Strong Support for 'unreasonable' assessment of site to be retained without development	Noted , this site is currently a reasonable alternative and is not allocated	No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0523 Dowding Road, Norwich (Unreasonable Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Councillor Karen Vincent	Comment	I note site GNLP0523 is currently deemed unreasonable for development. Should this decision change and the site be considered a reasonable site for development, I would urge that a requirement be included for the development to undertake off-site upgrades to Taylor's Lane to bring this up to Highways Adoptable standard. It is very likely Taylor's Lane would form part of the development's Access and Design statement to integrate new residents with the community to provide access to schools and community facilities in Old Catton. Taylor's Lane is an unmade road and is unsuitable in its current state to do this.	Improvements required to Taylors Lane should this current 'unreasonable' site be reconsidered for allocation	Noted , this site is currently a reasonable alternative and is not allocated	No change

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1061 Imperial Park (formerly site 4), Norwich Airport (Partly within Broadland – Horsham St Faith Parish), Norwich (Unreasonable Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 support, 1 object, 0 comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
GP Planning Ltd	Support	<p>The promoters of HNF2 strongly SUPPORTS the Council's stance that this is an unreasonable site for general employment uses. The site has extant planning permission for aviation uses. The site is a strategic site within the airport area and should be retained for such airport related uses.</p> <p>Changes in the aviation sector assume greater use of regional airports and the demand for airport related uses is likely to increase concurrently. A change to general employment is not supported as that would place additional pressure on other sites allocated for general employment.</p>	<p>Support for the '<i>unreasonable</i>' stance for the proposed site</p> <p>Expectation that need for aviation uses will increase following changes in aviation sector relating to regional airports.</p> <p>General employment use would place additional pressure on other sites allocated for such.</p>	<p>Following review of site allocations and evidence produced on behalf of Norwich City Council, this site is proposed to be allocated for aviation related uses only and not general employment land</p>	<p>Allocate for aviation related uses.</p>

<p>Barton Willmore for Norwich International Airport</p>	<p>Object</p>	<p>To support the previous representations in March 2018, Norwich Airport provided evidence in a Local Market Analysis Report, undertaken by Roche and Bidwells, that demonstrated the Site's potential to include large-scale B2 and B8 uses for which there is a proven demand and lack of comparable space in the region. Its size gives the Site the flexibility to support a wide range of economic sectors.</p> <p>The site can contribute to the region's large-scale development. It can support a number of uses, including large-scale B2 and B8 employment space.</p> <p>Norwich Airport proposes an allocation at the Site of a mixture of aviation and nonaviation uses, with the flexibility to release land for general employment depending on market demand. Part of the Site benefits from extant planning consent restricted to aviation-related uses. The lack of market demand has meant that there has been no uptake in aviation floorspace. This has been the case since the original planning permission for aviation-related uses was granted by NCC and BDC in 2013. The planning flexibility to include non-aviation related employment floorspace will help</p>	<p>The proposed allocation should:</p> <ol style="list-style-type: none"> 1. Be extended to 46.5 ha in total make efficient use of previously developed land, in accordance with national planning policy; 2. Include roadside and leisure uses (Use Classes A1-A5, sui generis, C1 and D2) given its situation adjacent to the region's strategic highway network and to improve the sustainability of the remainder of the Site for future employees (both aviation and non-aviation); and 3. Allow for a greater proportion of non-aviation floorspace to come forward in the event that the aviation floorspace 	<p>Following review of site allocations and evidence produced on behalf of Norwich City Council, this site is proposed to be allocated for aviation related uses only and not general employment land</p>	<p>Allocate for aviation related uses</p>
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		<p>bring the Site into economic use and contribute towards the provision of infrastructure required to support aviation-related employment, which is considered a knowledge-intensive sector by the GNLP.</p> <p>Policy 1 has allocated 360ha of employment land to aid the delivery of 33,000 additional jobs. It highlights the strategic locations for employment use, shown in Figure 1 below. It adds that the total amount of allocated and permitted employment land in 2018 is broadly enough to provide for expected and promoted growth.</p> <p>Norwich Airport would question the assertion that the land provided for in 2018 is sufficient for the region's needs throughout the Plan period. The Report undertaken by Bidwells and Roche has demonstrated that the existing employment floorspace is not of a high quality to support new businesses, shown at Appendix 2. New companies require flexibility and the Site is able to provide suitable floorspace that is beneficial from a quantitative (it would be the largest single allocation in the Plan) and qualitative (it would provide modern floorspace, adapting to companies'</p>	<p>is not realised in the next 5-10 years.</p>		
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		<p>requirements and market changes) perspective.</p> <p>Incorrect site area: Norwich Airport supports inclusion of the allocated land for employment in Policy 6 and that 50% is allocated for general employment uses. However, the proposed allocation does not include all of the land proposed for Site 4 that was submitted as part of the previous Regulation 18 representations, which extends to 46.5ha.</p> <p>The proposed allocation does not include available land to the west and east. It is requested that this land is included in the draft allocation. Paragraph 117 of the National Planning Policy Framework (NPPF) states that planning policies should promote an effective use of land, utilising previously developed land. Airport land is defined as previously developed land by the NPPF and therefore all the land should be made available and be allocated for employment uses.</p> <p>The Norwich Airport Masterplan, which has been adopted by NCC and BDC, does not identify the Site for any future airport operational or expansion requirements, with the exception of</p>			
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	<p>retaining the required fire training facilities. Paragraph 9.34 of the Masterplan states that it will safeguard 44% of the land (equivalent to 20.5ha out of the total 46.5ha) for aviation-related uses to maximise the opportunity for large-scale aviation-related development. Chapter 9 of the Airport Masterplan is shown at Appendix 3. This percentage was agreed between the Airport and NCC. This statement should be reflected in the GNLP since the Airport Masterplan has been adopted by NCC and BDC.</p> <p>In addition to providing large-scale industrial space for aviation and non-aviation uses, the Site's direct access onto Broadland Northway (A1270) makes it suitable for the provision of roadside and leisure uses (Use Classes A1-A5 / sui generis / C1 / D2). The allocation of retail uses will help to improve the sustainability of the Site as a whole by providing services and facilities for future employees in both aviation and nonaviation industries, reducing the need to make vehicular trips.</p> <p>Norwich Airport considers that the Policy should include a time limit, which seeks to reduce the amount of aviation-related employment floorspace over time,</p>			
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		reflecting market conditions. The allocation should be worded to allow for a greater proportion of non-aviation floorspace should the proposed aviation occupier not be realised in the next 5-10 years. This flexibility is supported by paragraph 81 (d) of the NPPF			
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