

## Summary of Main Issues – Evidence Studies

### Equalities Impact Assessment

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
	Hingham Town Council [12974]	24256	Object	Soundness and legal objections raised and challenge compliance with duty to cooperate: there is no evidence that policy requirement for pedestrian refuge for GNLP0520 is feasible or achievable. The indicative crossing infrastructure in the Bidwells submission will be dangerous. Dangers will be magnified for vulnerable residents of GNLP0520 will have to cross B1108 several times. These problems were not mitigated when adjacent site developed.	The plan is not considered unsound. The site promoter has confirmed there are no technical issues which cannot be overcome and the Highways Authority consider the site's access can be made suitable for all.	None

## Green Infrastructure Study

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
Green Infrastructure Study	Hingham Parish Council (Mrs A Doe, Clerk) [12974]	24257	Object	Detail of the conservation area are incorrect and therefore unsound as an evidence base. This is reference to the maps for Hingham, other maps may also be incorrect. Any decision based on location and extent of the conservation area would therefore be unsound.	Following investigation, the conservation area boundary for Hingham in this document is out of date. The boundary in this document was not instrumental to decisions being made relating to allocations in Hingham	Factual change to boundary in Green Infrastructure document.

## Gypsy and Travellers

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
Gypsy and Travellers	Stuart Carruthers [17100]	29425	Object	<p>1. The Gypsy/ Traveller Accommodation Assessment is flawed, and fails to take proper account of need / supply. I act as agent for a large number of the people affected by the LPA's.</p> <p>2. The Town and Country Planning system is expected to be a standalone jurisdiction. There have been significant breaches of the Town and Country Planning Act 1990 by two of the authorities. This includes over-enforcement of enforcement notices, failure to take account of grant of planning permission under s173(11), falsification of ownership of land by LPA's, demolition of listed buildings to secure benefits for Councillors, claiming of</p>	<p>The evidence underpinning the need and supply of Gypsy and Traveller accommodation is considered to be in accordance with guidance, as set out in the National Planning Policy Framework.</p> <p>In respect to other matters raised it is suggested that they are addressed through the appropriate council's complaints procedure.</p>	None

				<p>notices not contained in the s188 register.</p> <p>There needs to be a clear provision of the equivalent of a Criminal Complaints Review System to cover the LPA's (including compensation provisions). There additionally needs to be procedures under s173A to enable applications by citizens to enable certification of fraud by the Council's acting as a LPA. Without these provisions it is likely that there shall continue to be extensive breaches Human Rights and Equalities legislation.</p>		
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### Habitat Regulations Assessment (HRA)

POLICY/ MAP/ PARA NO. etc	RESPONDENT/ NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN
HRA 11.3.1 4.10.7 4.10.15 - 4.10.19 10.2.3	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23866	Object	<p>Not legally compliant Not sound</p> <p>HRA is incomplete and dependent on unfinished evidence (Water Cycle Study, GIRAMS). Visitor Pressure and water quality issues identified in the HRA.</p> <p>Currently insufficient evidence to demonstrate that no adverse effects on European Sites; therefore, Habitat Regulations not met.</p>	<p>The HRA evolves as the Plan progresses including, potentially, arising from the Reg19 stage. It took account of the almost finalised Water Cycle Study (WCS) and Norfolk GIRAMS and acknowledges that when finalised these will need to be considered and amendments made if necessary. The final WCS is now part of the evidence base; as is the final draft GIRAMS, though this is currently going through a process of approval by the Norfolk authorities. Issues identified in the documents has been addressed in the Reg19 Plan. The final documents will be</p>	None (subject to GIRAMS approval and any updates to HRA).

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					considered for the HRA and updates made as necessary. This will be part of the authorities' consideration of the Reg19 stage.	

### Housing and Economic Land Availability Assessment (HELAA)

POLICY/ MAP/ PARA NO. etc	RESPONDENT/ NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
HELAA	Mr John Shirley [18795]	23535	Object	Legal compliance, soundness and duty to cooperate objections raised. The HELAA assessment for GNL2019 and COL1 are seriously flawed e.g. a transport assessment will be needed to demonstrate how highway issues at Rectory Road can be mitigated yet the HELAA assessment for transport is green.	The HELAA is a broad, high level assessment of potentially available land and is not an indication that a site would achieve planning permission or be allocated in a local plan. The HELAA follows a standard methodology to assess sites against a number of criteria and has been used as the starting point for site assessments. Shortlisted sites were then subject to more detailed consideration involving colleagues from Development Management, Highways, the Lead Local Flood Authority and Children's Services before a final decision was made regarding suitability for allocation.	No change

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HELAA	David Lock Associates (Heather Pugh) [20014]	24515	Object	<p>Soundness objection raised in relation to the HELAA of the Silfield Garden Village proposal.</p> <p>The HELAA incorrectly assesses the SGV proposal against some of the HELAA criteria. When assessed correctly the SGV proposal scores favourably against the two alternative new settlement proposals being considered.</p> <p>The HELAA Addendum does not address site assessment inconsistencies across the three new settlement proposals and reinforces previous concerns raised. These inconsistencies should be addressed prior to submission and the new settlement work as proposed by policy 7.6.</p>	<p>It is acknowledged that the HELAA criteria do have limitations when considering sites promoted for new settlements due to their scale and that the HELAA's undertaken for such sites should be considered as only one element of a broader assessment.</p> <p>It is important to note that no new settlement sites are proposed for allocation at this time. Further assessment and consideration of options will be a key part of the process for the next Local Plan.</p>	No change

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				<p>The HELAA criteria have limitations when considering alternative locations for new settlement scale.</p> <p>The HELAA assessment for new settlements should be treated with a degree of caution and not considered in isolation but as one element of a broader assessment.</p>		

## Statement of Consultation

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
Statement of Consultation	CPRE (Michael Rayner) [14427]	23441	Object	Legal compliance, soundness and duty to cooperate objections raised to the decision not to hold a further Regulation 18 consultation in November – December 2020 and to push onto Regulation 19, thereby denying the opportunity for comment on new sites submitted at Reg 18c or amendments to policies. This lack of consultation is contrary to Regulations and Statements of Community Involvement.	The decision not to hold a further Regulation 18 consultation in November – December 2020 was taken after the publication of the Government's White Paper on the future of planning and is considered to be in line with planning regulations and SCI's. Planning Regulations anticipate that there will be changes after Regulation 18 consultation. It is very common for new sites to be proposed for allocation for the first time at the Regulation 19 stage or for site numbers or policy wordings to be changed. Changes may be made because sites have only	No change.

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					recently become available, to reflect additional evidence or to better meet needs. Plan preparation would be rendered very inflexible is all such changes requires a further regulation 18 consultation.	
Statement of Consultation	Hingham Parish Council (Alison Doe, Clerk) [12974]	24400	Object	<p>Legal compliance, soundness and duty to cooperate objections raised. The GNLP has not been prepared in accordance with the NPPF or the South Norfolk Council Statement of Community Involvement.</p> <p>The views of the Town Council and local residents were not taken into account. The GNLP team have not had sufficient time and resources to adequately consider the representations and it is a concern that the accelerated plan process has</p>	The GNLP authorities consider that the plan has been prepared in accordance with the Planning Regulations, the NPPF and Statements of Community Involvement. The representations received at all stages of the plan making process have been taken into account in the development of the plan as demonstrated in the Statement of Consultation.	No change

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				<p>led to representations not being fully considered and has also removed the opportunity for comments to be made regarding sites submitted during the Reg 18c consultation.</p> <p>There has been no feedback directly to the Town Council following the Reg 18c consultation, no information regarding the Reg 19 consultation on the 'have your say' page of the SNC website and concerns that people have not been directly notified of the Reg 19 consultation. The Town Council were not notified of the extension of the consultation</p>		

### Strategic Flood Risk Assessment (SFRA)

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
Strategic Flood Risk Assessment (SFRA) Level 2	Mr R Craggs [12893]	23477	Object	<p>I do not consider 'the plan' to be sound for achieving sustainable when maps are still not updated. I have furnished such detail from observations that even predate the Environment agency and numerous reports and indeed formal complaints concerning the non-compliance with Planning Policy Statement 25 Development and Flood Risk.</p> <p>massive developments are being approved and proceeding within a massive flood plain that is close to sea level and where the tidal effect is observable for miles inland such as with the river Wensum in Norwich.</p> <p>The concerns I have expressed for over two</p>	The Level 2 Strategic flood risk assessment has been produced by professional consultants who are experts in the field with extensive experience. The report has been produced in association with the Environment Agency, Lead Local Flood Authority, Anglian Water and Internal Drainage Boards.	No change

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				<p>decades have not diminished, viz:</p> <ol style="list-style-type: none"> <li>1. The threats posed by groundwater rendering the ground saturated and impeding percolation. Groundwater of course was never monitored by the Environment Agency yet the hidden and pernicious subtlety of it was known for centuries, now these consultation notes point out these facts but show little if any attempt to identify where it is or where flooding is expected to occur, refer to point 5 below.</li> <li>2. More land, especially agricultural ploughed and tilled land being developed thereby increasing run-off and reducing the acreage available for percolation.</li> <li>3. The above two points contributing to increasing the misconception about SuDS actually being sustainable,</li> </ol>		

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				<p>together with water attenuation systems that perversely are designed to prevent flooding but can actually cause it elsewhere</p> <p>4. Defective FRA's that have planned measures for exporting water off their respective sites but on to contiguous developments.</p> <p>5. Iterative flood maps not updated to indicate the effects of 1 to 4 above.</p> <p>These problems are not new or confined to GNLP but are evident in many parts of England as is well known and where hugely expensive "too late" measures create devastation on an increasingly frequent basis.</p> <p>Suggested Change: Developers should be required to contribute to compensation funds for inevitable consequences</p>		

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				rather than the burden falling on to others who warned them.		
Strategic Flood Risk Assessment (SFRA) Level 2	Mr Graham Martin [19999]	24321	Object	<p>The recent 2020 floods have been widespread including Norfolk and have raised awareness of flood issues and the risk of development.</p> <p>Around Norwich, for years there have been local and government action plans and flood assessment advising restricting development in most flood risk areas.</p> <p>I have just read with interest the Greater Norwich level 2 Flood Risk Assessment but I have not been able to view Maps showing,</p> <ul style="list-style-type: none"> <li>a. the extent of historic floods especially for the 1912, 1968 and 1993 events.</li> <li>b. Groundwater flood susceptibility in GNLP area.</li> <li>c. Surface Water flood areas.</li> </ul>	<p>The Level 2 Strategic flood risk assessment has been produced by professional consultants who are experts in the field with extensive experience. The report has been produced in association with the Environment Agency, Lead Local Flood Authority, Anglian Water and Internal Drainage Boards.</p> <p>The level two SFRA covers specific sites in the GNLP plan area at risk of flooding. Flood maps for the wider area can be viewed in the level 1 SFRA. Due to the complexity of the mapping it is compiled</p>	No change

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				<p>The Level 2 assessment is extremely useful for examining specific sites. These give a series of pictures but a single map linking the all Groundwater flood susceptibility areas in GNLP and one for Surface Water flood areas would give a holistic picture for these matters in the GNLP area. It is surprising that maps showing the extent of major floods have not been produced.</p> <p>the extent of historic flooding is not only important historically but has implications for development in the present day in river valleys</p> <p>Records indicate major flood events occurred in river systems in the Norwich area in 1770, 1784, 1878, 1912, 1947, 1968,1993 , 2015,</p>	<p>as a series of detailed maps.</p> <p>Records of major flood events are held by the Lead Local Flood Authority and have been used in the preparation of the cumulative impact assessment. However due to private address data, publishing of this information is not possible due to data protection regulations.</p>	

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				<p>2018 and 2020. This suggests that there is less than a 30 year interval between major floods and this interval is decreasing . Planning applications often do not mention this. Even a 30 year interval would make many developments unsustainable and the applications should be refused. Climate change is likely to increase the frequency of such flood events.</p> <p>Unfortunately the Environment Agency flood map for three major flood events, only shows the extent of the floods in selected areas. Surely with modern mapping techniques almost all historic flood events such as the 1912 event can be mapped and made available to towns and parishes. This would give everyone an idea</p>		

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				<p>of the potential extent of flood areas. The groundwater susceptibility maps for the Norwich area is interesting because it indicates potential extent for flooding.</p> <p>It would be informative if planners published information on the number and location of flooded properties in their area in the last 50 years and the dates when these properties were built.</p>		
Strategic Flood Risk Assessment (SFRA) Level 2	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]	24526	Object	<p>Representation relates to the L2SFRA in relation to the site on land north of Tuttle Lane East, Wymondham.</p> <p>The representation highlights how the site can achieve objectives set out in the SFRA relating to the river Tiffey at Wymondham. -The site is very well located to help reduce the rate of</p>	This representation is registered as an objection to the L2 SFRA. The content reads more as an objection to the decision not to allocate land north of Tuttle Lane East, Wymondham in the site allocations plan. This representation demonstrates how the land could be delivered	No change

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				<p>runoff being discharged into the Tiffey.</p> <ul style="list-style-type: none"> <li>- The site is well placed to provide some attenuation of stormwater flows from part of the urban catchment of Wymondham.</li> <li>-The inclusion of a flood alleviation basin or basins along the northern bank of the watercourse will make space for water being discharged from Wymondham. Combined with the potential diversion of the watercourse through the area (to create a sinuous channel), the alleviation basin also offers the opportunity to treat the runoff from Wymondham as well as ecological benefits associated within the channel and its banks.</li> </ul> <p>Providing such attenuation accords with the suggestion in section 6.3.1.2 of the Greater Norwich Level 2</p>	<p>in accordance with the recommendations of the L2SFRA</p>	

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				<p>Strategic Flood Risk Assessment (SFRA) that development sites should include additional water, and that Local Planning Authority (LPA), Environment Agency (EA), and Lead Local Flood Authority (LLFA) should work together to identify areas for providing flood alleviation features.</p> <p>As the proposed (developer funded) flood alleviation feature will help attenuate runoff generated from Wymondham before it reaches the River Tiffey, developing land north of Tuttle Lane East will therefore provide off-site benefits in line within the GNLPA evidence base</p>		

### Sustainability Appraisal (SA)

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN
SA (Relating to Chedgrave sites)	Mr Clive Boyd [19226]	23258	Object	<p>Not legally compliant Not sound Fails Duty to Co-operate</p> <p>SA is flawed in assessment of reasonable alternatives, environmental objectives, and social objectives.</p> <p>Site GNLP0463R is deficient, limited capacity in services; development will impact on beautiful area and character, not wanted by villagers etc. The SA does not consider impacts on existing residents.</p>	<p>The SA is a broad, strategic level assessment of sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level. The SA did not identify any overriding issues that would prevent allocation of the site in principle. The detailed assessment of the sites, having regard to the SA, are set out in the Site Assessment document and referenced in the SA.</p>	No change.
SA (relating to	Noble Foods Ltd [19330]	23569	Object	Not sound	The SA is a broad, strategic level assessment of	No change.

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Marsham sites)				SA is flawed in its assessment of the sites in Marsham. GNLP3035 (classed as an unreasonable alternative) a previously used site is preferable to GNLP2143 a greenfield site. GNLP 2143 should have had “major negative” scores for landscape and heritage impacts	sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level. The detailed assessment of the sites, having regard to the SA, and the selections for allocation are set out in the Site Assessment document and referenced in the SA.	
SA	Climate Friendly Policy and Planning (CFPP) (Dr Andrew Boswell, Consultant) [12486]	24247	Object	Not legally compliant Not sound  The SA is not fit for purpose in terms of carbon assessment. It does not assess carbon in a meaningful way; carbon emissions cannot be calculated as a direct relationship with population. A more detailed assessment	The SA is a broad, strategic level assessment of sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level.	No change

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				of carbon emissions is needed.	A detailed assessment of carbon emissions is not necessary for the SA.	
SA (relating to Hellesdon sites)	CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663	24350	Object	<p>Not legally compliant Not sound</p> <p>Possible alternatives have not been correctly assessed. Carried forward allocations without planning permission have not been reassessed in a comparable way to possible alternative sites (e.g. re mitigation and evidence). There is inconsistency between the assessment of sites, against the identified criteria, evidence base, and the reasons for not allocating sites.</p> <p>Criteria for selecting contingency sites appears to be predicated on size, being sites for circa 800-1,000 homes and not speed in the delivery of new homes.</p>	<p>The SA is a broad, strategic level assessment of sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level. The SA follows a consistent process. The Carried forward allocations have been included in the SA. The carried forward allocations were also previously subject to SA through their inclusion in the existing local plans and deemed to be acceptable for allocation. The</p>	No change

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				<p>The SA should reassess strategy and site allocation policies.</p> <p>The Site Assessment Booklets should follow and reference the SA assessment.</p> <p>Consequential amendments should be made to the policies and supporting text.</p>	<p>selection of contingency sites reflects the same process as for allocations i.e. they are deemed to be suitable for development if needed, but at this time it is felt that the needs should be met through other identified sites.</p>	
SA	ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]	24408	Object	<p>Not legally compliant</p> <p>Not compliant with the SEA regulations</p> <p>Reference made to the UK Climate Change Committee report re local authorities and the sixth carbon budget, and to the Norfolk Strategic Planning Forum paper on climate change and the planning system.</p> <p>The appraisal must assess the consistency of all proposed policies and sites with wider climate policy,</p>	<p>The SA is a broad, strategic level assessment of sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level.</p> <p>The GNLP takes into account the SA, and addresses issues such as climate change and carbon emissions, together with other</p>	No change

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				<p>including whether they fully support the achievement of the national net zero target. Adverse effects on emissions have been exacerbated by the decision to plan for a level of housing that exceeds the assessed need by some 20% / 10,000 houses, and which therefore unnecessarily provides for development on greenfield land and in unsustainable locations.</p> <p>As Service Centres are located in primarily rural areas, improvements to transport infrastructure set out in Policy 4 would be unlikely to provide all site end users with sustainable connections to Norwich, Norfolk and nationally. Village Clusters are also in rural locations with limited public transport and access to services etc as highlighted in the SA.</p>	<p>environmental, social and economic factors, and sets out an appropriate strategy to meet future development needs. The GNLP makes provision for more than the identified housing needs in order to provide a “buffer”. It can be expected that not all identified sites will be developed and, indeed, would not be as there would be no “need” for the excess, based on the current estimates.</p> <p>The Greater Norwich Area is largely rural with a large part of its population in the rural area. The needs of this population must continue to be provided for.</p>	

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				<p>The SA's findings would appear to support a quite different approach to site allocation – one that avoids as far as possible new development on greenfield land and in unsustainable locations.</p>	<p>The SA highlights that there are differences between locations which has been used to inform decisions on the strategy. The Strategy does focus growth in the more sustainable locations and using brownfield sites where appropriate, including Norwich, urban fringe, Main Towns and Key Service Centres which have a high degree of access to services, employment, public transport etc. A very limited amount of growth is provided for within the villages, acknowledging local level needs and to avoid their decline; and site locations have regard to the level of access to services etc. Hence, it is an appropriate strategy,</p>	

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					having regard to all the issues.	
SA (related to Hethersett / Cringleford site)	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24432	Object	Not sound  The GNLP is not justified regarding an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence and therefore conflicting with paragraph 35 of the NPPF.	The SA is a broad, strategic level assessment of sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level. Reasonable alternatives have been considered having regard to a proportionate level of evidence in accordance with the NPPF.	No change
SA	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24441	Object	Repeat of 24432		
SA	David Lock Associates	24516	Object	Not Sound	The SA is a broad, strategic level assessment of	No change

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	(Heather Pugh, Partner) [20014]			The SA incorrectly assesses the SGV (Site Reference: GNL4057A) against some of the sustainability objectives and the SA could benefit from an expanded assessment of the new settlement proposals	sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level. The detailed assessment of the sites, having regard to the SA, are set out in the Site Assessment document and referenced in the SA.	
SA (related to Long Stratton site)	Rosconn Group (Ben Ward, Senior Planning Manager) [19994]	24542	Object	Not legally compliant  Not sound  The spatial strategy is not justified as it has not been underpinned by a sufficiently robust SA process. Reasonable alternatives to the preferred spatial strategy have not been adequately appraised in the same detail or on the same basis.	The SA is a broad, strategic level assessment of sustainability issues, having regard to sustainability objectives, to inform the consideration of policies and allocations. It is appropriate, valid and correct for that level. Reasonable alternatives	No change

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					have been adequately appraised.	

## Viability Study

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Viability Study	Intali (Mr Adam Burdett, Director) [19912]	23833	Object	<p>Benchmark Land Value (BLV) - - Applying a premium that produces a BLV of £100,000/acre is not and has not been justified in the VA. The £348,000/acre adopted in the 2017 Hamson CIL is fully supported by the VA's own evidence which produces an average price of £365,000/acre. Thus the only metric available in the deliberately subjective calculation of Benchmark Land Value is that it has fallen by 72% in four years.</p> <p>We raised concerns about the BLV adopted for the Interim Viability Study as follows:</p> <ol style="list-style-type: none"> <li>1. No evidence was provided to support land-owner premium.</li> <li>2. No evidence or summary of cross-collaboration was provided.</li> </ol>	<p>A robust approach was taken in the preparation of the Interim Study where the premise was to arrive at a minimum return at which a reasonable landowner would be willing to sell their land by applying the EUV+ approach. This is clearly in line with NPPF 2019 and the most recent published update in March 2021.</p> <p>With regard to the greenfield Typologies (large non-urban sites) the BLV is 10x's the EUV which is agricultural value. 10 x's on basis of economies of scale. It should be noted that agricultural land values have</p>	None

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				<p>3. No rationale was provided for a reduction of BLV of £348,000 used in Hamson's 2017 CIL report to £100,000/acre in the interim report.</p> <p>Although the VA's limitations at para 364 are noted, we make the following comments:</p> <ol style="list-style-type: none"> <li>1. It is very disappointing that no Land Registry research has been undertaken to produce more confirmed transactions as suggested in para 015 of the NPPF.</li> <li>2. The three sale comparables provided are without acreage or unit numbers. These are of little use.</li> <li>3. The remaining evidence comprises 21 sites currently available, giving various levels of information.</li> <li>4. By the time the Local Plan reaches inquiry, many of these available properties will have been sold.</li> </ol>	<p>steadily fallen over recent times.</p> <p>While the HBS £348,000 per acre was arrived at using the approach suggested and then either increased or decreased with a range of between £300K and £600K per acre to reflect a typology assessed at that time, the sums assessed were a range of market values rather than a EUV plus approach which was subsequently the methodology adopted. The recent work reflects the latest Planning Policy Framework, published February 2019, and current Planning Practice Guidance.</p>	

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				<p>However, on the basis that 21 transactions are offered, we can assume that landowners are prepared to sell as, or close to the levels of price advertised. Using the data collated in Appendix H, we comment as follows:</p> <ol style="list-style-type: none"> <li>1. Average Site Area - 2.75 acres</li> <li>2. Average Asking Price - £1.911m</li> <li>3. Average Price/acre - £365,366</li> <li>4. Average Price/dwelling - £70,914</li> </ol> <p>Allowing for +/- 10% from asking prices to sale prices, the worst case 10% reduction on all properties would produce an average sale price of £330,000/acre. Ignoring urban centre typologies, this is 50% higher</p>		

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				than the highest BLV adopted in the Viability Report and more than three times higher than the BLV proposed for typologies 10 and 11.		
Viability Study	Intali (Mr Adam Burdett, Director) [19912]	23835	Object	<p>Gross to Net Site Areas</p> <p>For Typology 11, the table assumes a gross site area of 40 hectares and a net site area of 35.28 hectares. This represents a net to gross ratio of 88%.</p> <p>To achieve 88% net to gross site area on a Typology 11 development is not practical or feasible in reality.</p> <p>For comparison, a recent application for 516 dwellings on 23.94 hectares at Phase 2 of White House Farm (application 2019/1370) planned to achieve a ratio of 56%.</p>	<p>It is accepted that the larger scale typologies may have significant on-site infrastructure and/or on or off site open space requirements. The VA states that it has not taken mixed use sites into account. It is therefore anticipated that large strategic sites may well be considered on an individual basis.</p> <p>It remains relevant to provide such large scale typology's in order to compare typical albeit notional sites in the Greater Norwich area; one of the previous</p>	None

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				<p>During the course of the application, unit numbers were reduced to 456 and the net to gross ratio reduced to 49% to address Broadland District Council's concerns about the extent of the development.</p> <p>Densities</p> <p>At para 59, a new Typology 11 has been added since the Interim Viability Study. This assumes 1,000 units on a site area of 40 hectares. (25 units per gross hectare)</p> <p>Table 2: Typology Densities on page 23 contradicts this by stating a density of 40 units per gross hectare for Typology 11.</p> <p>Either Typology 11 supports 1,000 units as stated at para</p>	<p>criticisms was that the large strategic sites did not form part of the Study.</p> <p>However to fully pare down into the gross to net ratio of such sites could be misleading in that sites will vary considerably both as single sites or as part of a consortium of developers where open space and infrastructure might be shared. The example provided was one where 3 developers required equal development sites which together with the sites shape led to an over provision of green infrastructure and hence the lower gross to net ratio.</p>	

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				<p>59 and appraised at Appendix I - Typology 11, or 1,600 units as implied by Table 2.</p> <p>We assume this is a simple error.</p>	<p>The VA Table 2 Typologies 9, 10 and 11 densities stated per Ha were incorrect, the rates stated per acre however were correct.</p>	
Viability Study	Intali (Mr Adam Burdett, Director) [19912]	23836	Object	<p>We are concerned that the private sale revenues assessed in the Viability Appraisal (VA) remain excessive.</p> <p>This arises out of our own substantial research undertaken for three housebuilders as part of the work undertaken for the construction of up to 3,000 houses at Blue Boar Lane, Sprowston.</p> <p>Using the housebuilder's actual sale prices (all of which are publicly accessible on Land Registry), the range of values recorded was £1,866/m<sup>2</sup> to £3,634/m<sup>2</sup>.</p>	<p>A variety of sources were used to assess baseline revenues, each having a different weight attached but relevant nonetheless, this is considered not to be wholly inconsistent with assessing revenue for Local Plan purposes.</p> <p>For avoidance of doubt the collated data for sold house prices was obtained from LandInsight who source their data from the Land Registry and who will also uplift to market value at the date the data is sourced. Care was also taken to avoid</p>	None

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				<p>The VA reports a range from £2,950/m<sup>2</sup> - £3,750/m<sup>2</sup>.</p> <p>We note the additional research and market changes that have taken place since the interim viability report in 2019.</p> <p>However, we dispute the validity of using market surveys, asking prices and developer appraisals to assess baseline revenues for Local Plan viability purposes.</p> <p>There is a perfectly adequate, reliable and constantly updated source of data in the Land Registry.</p> <p>It has the added benefit of updating sold prices with the House Price Index (HPI) to provide instant current value estimates regardless of the date of the actual sale.</p>	<p>properties which appeared to be substantially less than the prevailing market value of that house type which were assumed to be shared ownership dwellings, use of these properties within an assessment would skewer the general revenue figures.</p> <p>Anticipated revenue streams will vary from house-builder to house-builder depending on size of development, location, product type and company objectives.</p>	

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Viability Study	Intali (Mr Adam Burdett, Director) [19912]	23841	Object	<p>Our clients are concerned with large residential sites typically built on greenfield land. Our comments relate only to matters relevant to Typology 10 and 11.</p> <p>It is noted at para 330 of the Viability Assessment (VA) that no comments were made to the Interim Viability Study (IVS).</p> <p>Para 333 of the VA quotes "market evidence" which "suggests" that developers are "increasingly" applying rates from 15% to 17.5% profit rather than seek the full 20% margin. Para 335 justifies a reduction in developer profit from the 20% used in the IVS down to 17.5% because "evidence suggests" developers accept the lower rates.</p>	<p>NPPF provides for 15% to 20% developer profit on revenue. This does not automatically mean that 20% should be applied to each of the notional typologies. The developer profit applied across the typologies in the VA had regard to the likely type and scale of notional schemes. The risk profile however of individual developers was not assessed.</p> <p>The evidence seen has been with regard to site specific critical appraisal assessments undertaken by the practitioner, some of this is within the public domain, some not and which will remain confidential.</p>	None

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				<p>Para 336 states that should viability be marginal sensitivity testing could be undertaken. Clearly no such testing has taken place to provide justification for this change in profit margin. There is constant reference to “evidence” throughout this section. None is provided.</p> <p>Paragraph 017 of the NPPF is clear that:</p> <p>“For the purpose of plan making, an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development.”</p>		

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				We consider the reduction in developer profit to be arbitrary, unevidenced and un-justified.		
Viability Study	Intali (Mr Adam Burdett, Director) [19912]	23845	Object	We are concerned that the Viability Appraisal has an error in the calculation of build costs at para 199, which suggests that BCIS build costs for apartments will be increased by 7.5%. Instead, build cost for flats should be based on the appropriate BCIS rate for flats, not an artificially adjusted figure sourced from the build costs of houses.	The BCIS rates applied to the flatted schemes were inflated to take into account the shared/communal areas, another approach would have been to increase the area assessed.  The Interim Study considered both but the former was adopted as the best approach at the time.	None
Viability Study	Dentons (Roy Pinnock) [20016]	24476	Object	The NPS Final Viability Report (12 January 2021) adopts a generic 1,000 home typology (T11) but this does not relate to the East Norwich Strategic Regeneration Area (ESRA). As such, the evidence base for the Plan does not adequately demonstrate the scale of	The East Norwich Strategic Regeneration Area is a unique and highly complex combination of sites, which sits outside the scope of this Study. Instead, a detailed master-planning	None

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				burdens (including the relative contribution of CIL), and how this will affect deliverability. So is contrary to NPPF paragraph 34.	exercise is being undertaken with the City Council and relevant promoters. This work will reveal the obligations that the Regeneration Area can viably meet.	
Viability Study	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]	24527	Object	<p>Whilst there is general support for the approach being adopted, there remains concerns regarding the assumptions being made within the Viability Appraisal. It is still suggested that the sales values; build costs; and benchmark land values, are too generic and not backed up by comparable evidence.</p> <p>It remains unclear if the general comments previously raised by Turner Morum LLP with the Interim Viability Study (Nov 19) have been adequately addressed, so they are reiterated below:</p>	<p>It is good that the general approach is supported however sales values, build costs, etc can only be generic rather than specific when dealing with notional typologies.</p> <p>All elements of the appraisals were assessed using data from trusted sources and applied in what is considered to be a logical way.</p> <p>The revenue assessed was considered to be robustly undertaken –</p>	None

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				<ul style="list-style-type: none"> <li>• The document has adopted average market revenues of £279 per ft2 for Wymondham, which is considered too high.</li> <li>• Based on market evidence the figure should be £250 per ft2. The affordable rent values are included at 60% of Open Market Values (OMV) averaging £168 per ft2, which is believed to be too high. Based on recent evidence it is suggested that this figure should be between 45%/50% of open market value.</li> <li>• The intermediate units (Affordable Homes Ownership) are included at 75% of OMV averaging £212 per ft2, which is believed to be too high. Based on recent evidence it is suggest that assuming a shared ownership model, the figure should be between 65% of open market value.</li> <li>• The Interim Viability Study document is vague about what</li> </ul>	<p>see above for specific comments relating to revenue.</p> <p>The assessment of Affordable Housing (ART and AHO) is based on a mid-way point at what RSL's would acquire at although there may be differences depending on an RSL's need/funding availability at a particular time.</p> <p>Affordable housing product type to be developed is likely to alter as a consequence of the Government recent White Paper and introduction of First Homes.</p> <p>The approach to assessing the infrastructure costs was</p>	

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				<p>the Affordable Housing units are intended to be. However, the GNLP Viability Assessment Paper (2018) is clear that standard intermediate housing are the intended units.</p> <ul style="list-style-type: none"> <li>• A figure of only £193,000 per net acre for strategic infrastructure is included whereas, based on experience of similar viability assessments, this should be approximately double. The approach is to include 20% on-top of BCIS for all external and strategic infrastructure costs, although 10% (as a minimum) would be required for plot externals costs – which leaves the remaining 10% for strategic infrastructure costs.</li> <li>• The GNLP analysis does not apply contingency or professional fees to the externals works of strategic infrastructure costs – which is a significant figure that would</li> </ul>	<p>to apply a percentage to core build costs on the basis that these are an assessment at high level of notional typologies. While site works and infrastructure costs are very specific to individual sites, it is considered that the values indicated are for sites which do not have any onerous or abnormal additional costs.</p> <p>With regard to contingency and professional fees care was taken not to double count fees. The professional fee level is also considered to be higher than current site-specific appraisals being undertaken.</p>	

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				<p>be further increased if strategic infrastructure cost were included</p> <ul style="list-style-type: none"> <li>• The allowance for finance costs, which are equivalent to juts 1.0% of GDV/ 1.3% of scheme costs, is very low. Based on comparable viability assessments, these costs should be double.</li> </ul>	<p>Allowance for costs associated with financial arrangement fees has been applied at rates considered acceptable for the assessments. If these were however to be increased, the overall impact on the viability would be marginal.</p>	

## Water Cycle Study (WCS)

POLICY/ MAP/ PARA NO. etc	RESPONDENT/ NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN
WCS	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23871	Object	<p>Not legally compliant Not sound</p> <p>The WCS is incomplete and indicates inadequate capacity at some Water Recycling Centres to meet demand. Therefore, there is insufficient evidence that there will be no adverse impacts on the River Wensum SAC and the Broads SAC, and so the Habitat Regulations are not met.</p>	<p>The WCS has been produced with input from Anglian Water Services, the Environment Agency, and Natural England. A draft WCS was available previously and the final version has now been included in the evidence base. It concludes that “The assessment has shown that subject to the revision of discharge permits and the implementation of the necessary treatment process upgrades (using conventional treatment technologies), changes in water quality as a result of additional discharge can be managed to ensure there is no overall increase in pollutant</p>	No change

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					<p>load, and no adverse change in water quality or connected water dependent ecologically protected sites as a result of growth” (Executive Summary pg v). Anglian Water’s Water Recycling Long-term Plan, already has plans for upgrades, though additional may also be needed. The WCS recommends that developers in the catchments of some WRCs should contact to Anglian Water Services in advance of development. As a consequence, text has been included in the GNLP to highlight the issue, indicating that the timing of development in these areas may be affected and that developers should</p>	

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					<p>contact Anglian Water Services (e.g. Policy 2 (iv), paras 253 -258 related to Policy 4 Strategic Infrastructure, and Appendix 1 Infrastructure Requirements under "Water". The issue of potential impacts on the SACS (and other European status wildlife sites) is addressed in the Habitat Regulations Assessment.</p>	