

Summary of Main Issues: Part 2 – The Sites (including comments on site assessment booklets).

Sites Plan - Introduction

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 1.1	Broads Authority (Natalie Beal) [12415]	23356	Support	<p>General support for the plan. Some comments raised which are not considered to be soundness issues:</p> <ul style="list-style-type: none"> - Throughout the document, no need to say 'National Park' just say 'The Broads' - Would be useful if all the site allocation plans had street names on – the required standard for most planning applications is at least two street names - Recommend adding wording to policies to refer to dark skies or limiting light pollution in the Broads. 	<p>Support noted.</p> <p>With regard to the correct way to refer to the Broads in the plan, no changes are required for soundness , however the GNLP authorities accept that minor modifications could be made to ensure that all references say 'The Broads' rather than 'National Park' for consistency.</p> <p>With regard to showing street names on allocation plans, no change is proposed as this is related to the base map that has been used.</p> <p>With regard to dark skies or limiting light pollution in the Broads the policies as worded in the plan are considered to be sound and therefore it is not necessary to make the changes suggested, however the GNLP authorities would not object to proposed modifications being put forward by the Inspector to support the protection of dark skies.</p>	<p>No change.</p> <p>Make minor modifications to clarify and regularise references to the Broads throughout the plan.</p> <p>If the Inspector is minded to make a change the GN authorities would not object to the possibility of proposed main modifications to support the protection of dark skies as relevant throughout the plan</p>
Para 1.3	Mr Peter Milliken [13706]	23333	Object	<p>Objections raised on legal compliance, soundness and duty to cooperate grounds.</p> <p>How can this be a full coherent interlocking plan if a section is missing covering the area of South Norfolk. Suggest plan should be withdrawn and resubmitted once all the information is at hand.</p>	<p>The preparation of a separate South Norfolk Village Clusters Plan was a decision taken with legal advice prior to the Regulation 18C consultation on the draft GNLP to reflect the more rural nature and needs of South Norfolk. The South Norfolk Village Clusters Plan will have to accord with the strategic policies in the GNLP including the minimum number of dwellings to be provided.</p>	No change
Para 1.3	Le Ronde Wright (Alistair Curran) [20003]	24486	Object	<p>Soundness objection raised regarding the preparation of a separate plan for South Norfolk villages. The GNLP should include all potential allocations within its administrative boundary to ensure a comprehensive growth strategy.</p>	<p>The preparation of a separate South Norfolk Village Clusters Plan was a decision taken with legal advice prior to the Regulation 18C consultation on the draft GNLP to reflect the more rural nature and needs of South Norfolk. The South Norfolk Village Clusters Plan will have to accord with the strategic policies in the GNLP including the minimum number of dwellings to be provided.</p>	No change

Site Assessment Booklets Introduction

POLICY/ MAP/ PARA NO. etc	RESPONDENT/S NAME & ID REF	REP ID/s	SUPPORT/ OBJECT	MAIN ISSUES RAISED	COUNCIL REPOSE	POTENTIAL CHANGE TO PLAN
Introduction	Historic England (Debbie Mack) [19652]	23977	Object	Soundness objection raised relating to site assessment booklets and lack of Heritage Impact Assessments. Insufficient evidence in relation to the historic environment to support the site allocations. The assessments do not follow the five step methodology for site allocations set out in our Advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets or mitigation and enhancement. This is particularly concerning for the sites where we suggested more detailed HIA was required and we continue to advise that these are prepared. Some new sites will also require HIAs.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken for the sites identified by Historic England which has not raised any insurmountable difficulties for their development. However, it is acknowledged that development will need to be undertaken sensitively with regard to heritage assets which is recognised in the supporting text and policy requirements for those sites.	No change

Norwich and the Urban Fringe (chapters and site assessment booklets)

Norwich Sites

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Norwich Settlement Map (Centre)	pal-planning ltd (Mr Peter Luder, Director) [19950]	23792	Object	Land at and adjoining Anglia Square should also include the land 'under the flyover' on Magdalen Street.	The site area is that submitted for consideration. The policy as worded is considered to be sound and therefore it is not necessary to make the changes suggested, however the GNLP authorities would not object to proposed modifications being put forward by the Inspector to include the area under the flyover.	No change, however, the councils would not object to adding the additional site area as a main modification to the plan.

Existing Allocations Carried Forward (Norwich)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
CC2 (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	23924	Support	Landowner support for carried forward allocation including policy wording. The site is deliverable	Support noted	No change
CC2 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23994	Object	Identification of key listed buildings affected by allocation should be listed in policy. Policy wording should also make reference to the 'Area of Main Archaeological Interest'	This is an existing allocation which is being carried forward. The area of main archaeological interest is referenced in supporting text paragraph 2.104 Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.	Make factual correction/minor modification. Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.
CC3 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23995	Support	Welcome updates made to policy wording (criteria 2,3&7) since regulation 18 to reference heritage assets and archaeology	Support noted	No change
CC4a (2.121)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23370	Support	Typographical/grammatical error: 2.121: 'Development of site CC4a should explore continued use/re-provision of the existing community garden facility'.	Typographical error noted	Make a minor modification to correct the misspelling of 'use' in para. 2.121.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
CC4a (supporting text)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23907	Object	Suggested additional paragraph in supporting text relating to an existing surface water sewer.	Reference has been made to the surface water sewer in supporting text para.2.120. However, it is accepted that a minor modification on the issue would provide further clarity.	Make a minor modification to the supporting text to add text at the end of paragraph 2.120 to read: In addition, there is an existing surface water sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance
CC4a (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23996	Support	Welcome changes made to allocation policy since regulation 18C consultation with reference to heritage assets	Support noted Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.	Make factual correction/minor modification Add sentence to paragraph 2.120 to state: Development of the sites must address a number of constraints including its location within the City Centre Conservation Area and the Area of Main Archaeological Interest. Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.
CC4a (policy)	Lesley Grahame [20000]	24333	Object	Employment welcomed but must be compatible with surrounding high-density residential areas. Rose Lane Garden should be removed from allocation CC4a and be a separate Local Green Space Allocation	Comments regarding compatibility of uses noted and accepted. Rose Lane community garden is referenced in the supporting text and policy, this is considered sound.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.	Whole life carbon analysis relates to a strategic approach rather than being site specific. It would not be appropriate to apply this to individual allocations Sustainable development principles are set out in strategic policies 2 and 3.	
CC4b (policy)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23369	Support	Due to similarity of site allocations, supporting text would benefit from consistency with wording for CC7 relating to early engagement with the Environment Agency and Broads Authority.	The addition of supporting text to state the same as paragraph 2.134 (relating to CC7) is agreed as a helpful minor modification to provide clarity.	Make a minor modification to add the following text in bold print after the final sentence of paragraph 2.121 so that it reads: Development of site CC4b must be of a scale and form which respects and takes advantage of its riverside context and location in respect to the Broads National Park. As the site lies adjacent to the River Wensum, it is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority.
CC4b (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23997	Support	Welcomes criteria 3, 4 and 5 which reference heritage assets. It will be important that density and scale of development on this site properly reflects the character of the Conservation Area.	Support noted Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.	Make factual correction/minor modification Add sentence to paragraph 2.120 to state: Development of the sites must address a number of constraints including its location within the City Centre Conservation Area and the Area of Main Archaeological Interest. Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
						Archaeological Interest. An archaeological assessment will be required as part of a planning application.
CC4b (policy)	Savills (Edward James, Planner) [19668]	24372	Object	Welcome and support site allocation in principle. Suggest changes to the policy: <ol style="list-style-type: none"> 1. Uses - inclusion of C2 residential care home, removal of educational facilities. 2. The approach to privately owned designated open space. 3. The approach to landmark buildings 	The policy wording is not restrictive " <i>other uses may be provided</i> ". Whilst C2 residential care homes is not listed, it does not mean that it cannot form part of the mixture of uses. Similarly, the provision of educational facilities to support an existing school on this site is not a requirement, but an acceptable use. Retention of designated open space on this site is desirable, particularly given the low levels of open space in this area of the city. The approach to landmark buildings follows a review of policy in consideration of responses to regulation 18C consultation and is not specific to site allocation CC4b; appropriate design is covered in point 3 of the policy.	No change., however, the GN authorities would consider review of the wording to point 8 of the allocation policy as a proposed modification to the plan if the Inspector considered this to be appropriate,
CC7 (2.134)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23361	Support	Suggests that the wording used in this paragraph would also be useful in policy CC4b	Suggestion noted. This representation does not suggest any amendments to policy CC7. Policy CC4b as written is considered to be sound but in this instance we would not object to the inclusion of the additional supporting text to clarify the situation as set out in response to representation 23369 above	No change to policy CC7,
CC7 (policy)	Waller Planning (Mr Tim Waller, Director) [19922]	23641	Object	Support allocation in principle. Suggest policy includes viability at application stage due to site constraints relating to 'at risk' listed buildings on site. Policy should acknowledge Council's role in providing riverside access.	Support in principle noted. Affordable housing is not addressed in site specific policies, but in strategic Policy 5 – Homes. It states that at least 28% affordable housing on-site in Norwich City Centre, or where "b) for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage;" As such this point is already covered and does not need to be repeated in the allocation policy.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					Regarding 'Riverside': Site allocation policies do not attribute responsibility of named parties to deliver development.	
CC7 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23998	Object	Requirement for archaeological assessment is mentioned in supporting text; this should also be included in the policy.	Suggestion noted. Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.	Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.
CC7 (policy)	Lesley Grahame [20000]	24334	Object	Development must protect trees and proposed river access and walk Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target	Riverside walk, riverside location and landscaping are addressed in policy requirements; tree assessment addressed in supporting text Whole life carbon analysis relates to a strategic approach rather than site specific. It would not be appropriate to apply this to individual allocations	No change
CC8 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23999	Object	Update to criteria relating to historic street frontage, the Conservation Area and listed buildings, scale and form of development and locally listed structures since reg 18C welcomed Supporting text mentions trial trenching will be required prior to development, this should be included in policy.	Suggestion noted. Policy CC8 as written is considered to be sound but in this instance we would not object to the inclusion of the additional policy requirement for trial trenching in addition to the reference in the supplementary text if the inspector considered this to be appropriate	Make factual correction/minor modification. Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment including trial trenching will be required as part of a planning application prior to development.
CC8 (policy)	Lesley Grahame [20000]	24335	Object	Policy intention to recreate historic streetscape should be replaced with priority to retrain the mature trees lining the boundary of the site.	Retention of existing structures is dealt with in allocation policy paragraph 4.	No change Re: Criterion 3. If the Inspector is minded to make

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				<p>Preference for the existing warehouse buildings to be retained, renovated and re-used for accommodation rather than demolished.</p> <p>The number and size of homes should be compatible with retaining both the heritage building and existing mature trees.</p> <p>Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target</p>	<p>Policy CC8 as written is considered to be sound but in this instance we would not object to the revision of the policy to require retention of the existing mature trees at the king street frontage (now TPO'ed) and omitting the requirement to reinstate the historic street frontage from the policy.</p> <p>Whole life carbon analysis relates to a strategic approach rather than site specific. It would not be appropriate to apply this to individual allocations</p>	<p>a revision to the policy to retain the existing trees at the King Street frontage and delete the requirement to reinstate the historic street frontage as a Proposed Modification, then the GN authorities have no objection to this.</p>
CC8 (policy)	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24507	Object	<p>The number of homes should be compatible with retention of the industrial heritage buildings and the existing mature trees.</p> <p>The retention of these trees and the boundary wall outweighs the reinstatement of the street frontage. As the trees have matured over the last few years since policy decisions about this site were made, they are now of greater value and so policies affecting this site should be revised if they are to remain sound.</p> <p>Retention of the warehouse buildings on this site, prefer to see them renovated and re-used, most likely for accommodation, rather than demolished.</p> <p>River access and the further retention and promotion of biodiversity also need to be considered as part of the site development</p>	<p>Retention of existing structures is dealt with in allocation policy paragraph 4.</p> <p>Policy CC8 as written is considered to be sound but in this instance we would not object to the revision of the policy to require retention of the existing mature trees at the king street frontage (now TPO'ed) and omitting the requirement to reinstate the historic street frontage from the policy.</p> <p>Access to river alongside retention of existing structures, however this is covered in allocation policy paragraph 5</p>	<p>No change</p> <p>Re: Criterion 3. If the Inspector is minded to make a revision to the policy to retain the existing trees at the King Street frontage and delete the requirement to reinstate the historic street frontage as a Proposed Modification, then the GN authorities have no objection to this.</p>
CC10 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24000	Object	<p>Welcome the changes to the policy to include reference to the Conservation area and listed buildings at criterion 1 (criterion 2 is the same as criterion 1. Delete criterion 2).</p> <p>We welcome criterion 4 in relation to archaeology.</p>	<p>Appreciation of amendments since regulation 18C acknowledged. Highlighting of typographical error repeating the same policy requirement twice and suggestion one is deleted acknowledged.</p>	<p>Make the following minor modifications: A typographical error has been highlighted. Deletion of the repeated criterion 2 is appropriate.</p>
CC11 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24001	Object	<p>Welcomes the addition of criterion 1 that specifically mentions the conservation area and listed buildings.</p> <p>The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy.</p>	<p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in</p>	<p>Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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					policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
CC13 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24002	Support	We welcome the inclusion of criteria 1 and 2 in relation to scale and massing and also impact on nearby conservation areas.	Support noted	No change
CC15 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24003	Object	This site is located adjacent to the St Matthews Conservation Area. There are also two grade II listed buildings to the north of the site (The Coach and Horses public house and 60 Thorpe Road). The nearby station is also grade II listed. We welcome mention of the conservation area in the policy at criterion 1. The policy should also mention the listed buildings.	No changes are required for soundness, however the GNLP authorities accept that minor modifications could be made for clarity by including reference to nearby grade II listed heritage assets.	No change Re criterion 1 - If the Inspector is minded to make a change, inserting reference to grade II listed buildings (The Coach and Horses public house, 60 Thorpe Road and Norwich train station) as a Proposed Modification, then the GN authorities have no objection to this
CC15 (policy)	Lesley Grahame [20000]	24336	Object	Employment and residential uses are welcome on this brownfield site. Existing trees and hedges should be retained/accommodated as part of any future development – clause 2 ‘built frontages’ is unclear whether this means up to the pavement whereby trees & hedges would be lost. The pavement would feel claustrophobic & options for gardens would be reduced. If this is the intention, this clause should be removed due to conflict with biodiversity and climate change requirements, and with the character and amenity of the area would make this part of the plan unsound. Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target	Built frontages is not intended to mean ‘up to the pavement’, the character of the area is to have small gardens and driveways fronting residential and commercial developments. The intention is to provide frontages in the character of the area which provide natural observation to the streets which they line with enhanced landscaping and green infrastructure. No changes are required for soundness, however the GNLP authorities accept that minor modifications could be made for clarity including reference to gardens and landscaping fronting the streets at criterion 2. Sustainable development principles are set out in strategic policies 2 and 3.	No change Re criterion 2 - If the Inspector is minded to make a change, inserting reference to “including gardens and landscaping fronting the streets” as a Proposed Modification, then the GN authorities have no objection to this.
CC16 (2.198)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23358	Support	As a matter of consistency. We note that para 2.198 says this ‘Given the site’s highly accessible location and the intention to provide new public transport links it is considered suitable to include car-free housing. In any event car parking levels should be kept low’. We note that other sites may say that the site is considered suitable for car free housing, but the wording in those	Comments noted	No change

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				instances does not go on to talk about the last part – car parking levels should be kept low. You may want to check to see if this wording is needed for other allocations.		
CC16 (2.203)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23371	Support	<p>Main point: We request that this is worded like 2.134 as follows: '2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'. At the moment, what is worded only refers to the EA. Considering what is written at 2.134 and considering the similarities in the location of the site, it seems logical to be consistent and include the Broads Authority as suggested</p> <p>Minor point Does not mention about making most of riverside location in supporting text like other policies. The actual policy does. You may wish to add something to the supporting text to be consistent</p>	The addition of the supporting text is not considered to be a soundness issue, however if the Inspector were minded to add these requirements to the policy text the GN authorities would not object.	<p>Make the following minor modification to paragraph 2.203:</p> <p>“The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority.”</p>
CC16 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24004	Support	We welcome the changes to this policy to include criterion 2 that specifically references the Bracondale Conservation Area and nearby listed buildings including Carrow Priory and Boom Towers.	Support noted	No change
CC16 (policy)	Bidwells (Mr Iain Hill, Partner) [16273]	24233	Object	<p>Strongly support allocation for mixed use development. The site is entirely deliverable.</p> <p>Minor alterations considered necessary: Clarification of the 270 homes – does this include commitment or all new homes (agent considers it should be latter & set at 200 to be accommodated in the car park area)</p> <p>Elements of the policy are now under construction – such as that fronting the river which is enhancing the river setting. The undeveloped areas around the car park which are not adjacent to the river cannot deliver this aspect of the policy.</p> <p>The site has the potential to help facilitate the regeneration of the East Norwich area by ensuring that any development on the site does not prejudice the ability to ensure future connectivity, most notably through pedestrian and public transport links, in the future. However, whilst future connectivity with the East Norwich area is a key objective, the development of</p>	<p>This allocation site benefits from existing consents. 50 units are recorded as completed in phase 1, 270 units remain to be delivered through following phases; they have been allocated in the event that they do not come forward as consented.</p> <p>Provision of a public transport interchange is a long-term ambition for this site, being a policy requirement in the existing adopted allocation which is being carried forward. Now that Carrow works has increased the prospect of the ESRA being delivered in the coming years, this provision continues to be important.</p>	No change

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				<p>the site, which may be developed in phases, 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 result in the policy being unsound on the basis it does not provide an appropriate strategy.</p> <p>whilst it is acknowledged that any development will need to demonstrate how it will connect and be accessible by public transport, the requirement to provide a public transport interchange is not justified and is considered unnecessary. No information has been required on what is required to deliver a public transport interchange on the site. Therefore, it has not been possible to assess the implications for the viability of any development on the site of this requirement.</p> <p>It is proposed that in order to ensure the proposed policy is justified and, therefore, sound that reference to both a public transport interchange on site and a public transport strategy for the wider Norwich East area is removed.</p>		
CC16 (policy)	Lesley Grahame [20000]	24337	Object	<p>The draft deems this 'site is critical to unlocking the regeneration of the wider area' , I welcome the proposed 'comprehensive approach to be taken to access, particularly in terms of public transport links and pedestrian and cycle links' and would like to add two additional points:</p> <ul style="list-style-type: none"> - Re-opening a train halt at Trowse - Provision of more open amenity space is required <p>There is considerable need for more facilities and better transport to meet traffic neutral needs and climate change requirements.</p> <p>Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.</p>	<p>The provision of a re-opened train halt at Trowse does not come under the remit or parameters of this site – particularly as this site does not bound the railway at any point.</p> <p>The site allocation policy has a requirement for high quality green infrastructure, landscaping, planting and biodiversity enhancements; there is not a specific requirement to provide more open amenity space. This was not a requirement of the existing allocation that is being carried forward and as the remaining undeveloped area of the site allocation, it is not proposed as an additional requirement in this instance.</p> <p>Sustainable development principles are set out in strategic policies 2 and 3.</p>	No change
CC17a & CC17b (2.206)	Lesley Grahame [20000]	24338	Object	<p>This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation</p>	<p>This representation is made against Policy CC17a and CC17b, but referenced to GNL0409AR and GNL0409BR. CC17a & CC17b sites are not carried forward in their existing adopted form, but are superseded by</p>	No change

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				Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target	<p>policies GNLP0409AR & GNLP0409BR which are on different boundaries with new policies.</p> <p>Affordable housing policy is covered in strategic policy 5.</p> <p>Sites GNLP0409AR & GNLP0409BR are both expected to provide car free or low car housing as part of the allocation policies in accordance with the requirements of strategic Policy 2.</p> <p>Sustainable development principles are set out in strategic policies 2 and 3.</p>	
CC18 (CC19) (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24005	Object	<p>Land at 140-154 Oak Street and 70-72 Sussex Street Unsound We welcome the changes to criterion 1 to include specific reference to the grade II listed Great Hall.</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy. Include criterion in relation to archaeological assessment in policy.</p>	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.</p>	Make factual correction/minor modification. Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.
CC24 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24006	Object	<p>We welcome criteria 1, 2 and 4 and in particular welcome the reference to height in criterion 2.</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p>	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites</p>	Make factual correction/minor modification. Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
CC30 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24007	Object	<p>We welcome the revisions to criteria 2 and 5 to specifically reference listed buildings, the City Centre Conservation Area scheduled monument and scale and massing as well as heritage interpretation.</p> <p>The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy. Include criterion in relation to archaeological assessment in policy.</p>	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	Make factual correction/minor modification. Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.
R1 (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	23925	Support	<p>Support for the allocation within the Pre-submission Reg 19 GNLP. Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable for the suggested uses within the proposed site allocation</p> <p>Accepts most of the changes to wording to the policy, with some suggestions to changes of wording to ensure soundness:</p> <ul style="list-style-type: none"> - Greater flexibility of use classes in spirit of flexibility of new use class E to include E(gi), (gii) and (a) - The GNLP allocation requires the development to make provision for off-site improvements to the junction of Hall Road and The Neatmarket, caused by increased traffic generation from the site. Wording should revert to existing allocation wording only requiring appropriate vehicular access to be provided to serve development proposed from Hall Road. Works to implement a suitable access to the site will be established at the planning application stage. 	<p>Support noted</p> <p>As set out in policy 6 and supported by The Employment Town Centre and Retail study – it is not concluded that existing employment sites and allocations should be reallocated for other uses; as such the existing uses detailed in the allocation are considered appropriate. Allocation of retail uses outside of the designated retail areas would be likely to undermine the need to protect and promote town centres.</p> <p>The policy requires site access arrangements to be provided, the detail of which can be refined at planning application stage</p>	
R2 (policy)	NPS Property Consultants Ltd (Mr Andy Scales, Head	23701	Support	Norfolk County Council, as landowner, supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable	Support noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	of Planning Consultancy) [14146]			and deliverable for development in the earlier part of the plan period.		
R7 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24008	Support	We welcome reference in bullet point 2 of the policy to the church and the locally listed residential terraces.	Support noted	No change
R13 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24009	Object	We welcome the inclusion of bullet point 2 in the policy but continue to suggest that reference should also be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.	No changes are required for soundness, however the GNLP authorities accept that minor modifications could be made for clarity by including reference to the nearby City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House in criterion 2	No change If the Inspector is minded to make a change, inserting reference to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House in criterion 2 as a Proposed Modification, then the GN authorities have no objection to this
R13 (policy)	Lesley Grahame [20000]	24339	Object	Given the level of constraints of the site, a more sound plan would be to keep the area as woodland helping to meet biodiversity and climate objectives and removing a risk to Thorpe Ridge Conservation area. If this site were to be developed, soundness requires whole life cycle carbon analysis on all buildings	The principle of development has been accepted on this site through its existing allocation. This is a brownfield site in a sustainable location, preparatory work for the site has commenced through the decommissioning and removal of the former gas holder. Sustainable development principles are set out in strategic policies 2 and 3.	No change
R13 (policy)	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24508	Object	Given the acknowledged constraints of the site, the steep hill and surrounding woodland, and the risks to properties above from undermining the hill on which they stand, we advocate keeping the area as woodland. This would support biodiversity and climate objectives and remove a risk to the Thorpe Ridge Conservation area	The principle of development has been accepted on this site through its existing allocation. This is a brownfield site in a sustainable location, preparatory work for the site has commenced through the decommissioning and removal of the former gas holder.	No change
R14/R15 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24010	Support	We welcome the reference to the City Centre and St Mathew's conservation areas as well as the Thorpe Hamlet conservation area. We welcome criterion 3 in relation to important views.	Support noted	No change
R17 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24011	Support	We welcome the reference to the locally listed shoe factory building in the policy.	Support noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
R17 (policy)	Mrs Sarah Clinch [19334]	24352	Object	The Allocation policy is considered to be unsound for two reasons: 1) The policy approach to retention/reuse of existing buildings. It is considered unjustified, based on out of date evidence and inappropriately worded. 2) Development specification (relating to wording requiring ' <i>high quality, locally distinctive design</i> ') It is considered that this repeats requirements of strategic policies and places inappropriate or misleading emphasis on the requirements for this site. Alternative wording suggested.	Evidence would need to be provided to justify the demolition of the undesignated heritage assets. Deterioration of the buildings is referenced in the representation, wilful neglect of a building is not justification for subsequent demolition. The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification to criterion 2 in accordance with the site representatives representation to omit the words ' <i>achieve high quality, locally distinctive design</i> ' and simply state ' <i>be of a design and scale which reflects its prominent location</i> ' being put forward by the Inspector	No change If the Inspector is minded to make a change to criterion 2 to omit " <i>achieve high quality, locally distinctive design</i> " as a Proposed Modification, then the GN authorities have no objection to this.
R20 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24012	Support	POLICY R20 Land east of Starling Road Sound We welcome bullet point 2 of the policy that references the Conservation Area and locally listed terraces.	Support noted	No change
R31 (policy)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23834	Support	(Site owner) 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	Support noted	No change
R31 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24013	Support	We welcome the changes to criterion 2 to specifically reference St Bartholomew's Church and the various locally listed buildings. We welcome criterion 9 relating to archaeological assessment. (Updates since reg 18C draft)	Support noted	No change
R31 (policy)	Savills (UK) Ltd (Mr Mark Hodgson, Associate Director) [13086]	24109	Support	Support for allocation policy, acknowledgement of constraints to be addressed. Reassurance that the land will be available for development in the plan period.	Support noted	No change
R33 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24014	Support	We welcome reference to Earham Cemetery in criterion 1 and to heritage interpretation at criterion 5.	Support noted	No change
R36 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24015	Support	We welcome bullet point 1 of the policy that references the Conservation Area.	Support noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
R37 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24016	Support	We welcome the changes to the policy wording to make specific reference to the Earlham Cemetery Registered Park and Garden and listed Jewish Mortuary Chapel.	Support noted	No change
R38 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24017	Support	We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.	Support noted	No change
R42 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24018	Support	We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.	Support noted	No change

New Allocations (Norwich)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
GNLP0068 (2.30)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23365	Support	support the fact that early engagement with us is recommended, but not clear why the only reason is flood risk. Or does that part of the sentence only refer to AWS? It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.	Sentence states that early engagement is always recommended. It does not state that this is only for flood and water disposal issues, but that this matter is of particular importance on this site.	No change
GNLP0068 (policy)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23364	Support	This policy should include the requirement to 'make the most of its riverside location' in a consistent approach with other allocations adjacent to the river. Typographical error – missing full stop prior to final sentence of bold allocation text.	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector.	No changes are required for soundness, however the GNLP authorities accept that a minor modification should be made adding a full stop before the final sentence of the bold allocation text. As a main modification, if the Inspector is minded to make a change to criterion 2 to add "and makes the most of its riverside location" as a Proposed Modification, then the GN authorities have no objection to this.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
GNLP0068 (policy)	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23789	Support	The text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis.	Support noted	No change
GNLP0068 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23980	Object	We welcome the changes to policy and the addition of criterion 3 in relation to heritage assets. The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.	The Area of Main Archaeological Interest is listed as a constraint in the supporting text. Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.	Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.
GNLP0133BR (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23981	Object	We continue to suggest that a detailed HIA is prepared for the campus as a whole to inform future development and the impact on the historic environment.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.33 and criteria 2 which requires the protection and enhancement of the significance of the heritage assets and the submission of a Heritage Impact Assessment as part of any development.	No change
GNLP0133BR (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	24076	Support	(Site promoter) Supports allocation & states that the site remains suitable, available and achievable in plan period. Confident that development of the site is viable. Suggest a minor modification is necessary to achieve legal compliance. To ensure the legal compliance of the policy wording, we would suggest that reference to 'Use Class F1' is revised to read 'Use Class F.1'. This is suggested to ensure exact compliance with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	Support noted A typographical error has been highlighted which is required for legal compliance, the GN authorities have no objection to this The GNLP authorities accept that a minor modification could be made to correct the following error/factual change: 'Use Class F1' to be revised to read 'Use Class F.1' in the bold text at the top of the allocation policy.	Make a minor modification. The GNLP authorities accept that a minor modification should be made to correct the following error/factual change: 'Use Class F1' to be revised to read 'Use Class F.1'.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
GNLP0133C (policy)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23896	Object	Notification of existing water mains within the boundary of the site which would need to be considered as part of any development design proposals. Suggested change: Add new criterion to Policy GNLP0133C: 'the safeguarding of suitable access for the maintenance of water supply infrastructure.'	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity by including the following wording in the supporting text: 'There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance'	No change Minor modification to make a change to the supporting text inserting "There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance" to paragraph 2.35
GNLP0133C (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	24075	Support	Site allocation policy supported by site promoter on behalf of landowner. Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable.	Support noted	No change
GNLP0133DR (Map)	Miss Dee Randell [15466]	23704	Object	Loss of recreational areas, such as woods, fields and paths, to accommodation buildings. Loss of wildlife that inhabits the wooded areas that will be destroyed. Lack of access to the Yare Valley green corridor while building works are ongoing. Disruption to the wider wildlife that lives near those areas. Greater numbers of students, putting pressure on local amenities, roads and green space. Private housing will see more student let, meaning more cars on local roads and estates, more noise and disturbance.	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 addresses improved public access & biodiversity enhancements in the requirements	No change
GNLP0133DR (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23982	Object	Criterion 2 has been very much improved by reference to heritage assets. We suggest replacing respect with 'conserve and enhance the heritage significance. We also suggest inserting a comma after Terraces. We continue to suggest that a detailed HIA is prepared for the campus as a whole to inform future development and the impact on the historic environment.	A typographical error has been highlighted. The GNLP authorities accept that a minor modification should be made to correct the following error: 'addition of a comma after the word 'Terraces' and before the word 'Grade' in criterion 2 of the policy text. The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested to criterion 2 (replacing 'respect' with 'conserve and enhance'), however the GNLP authorities would not object to a proposed modification being put forward by the Inspector'	Minor modification The GNLP authorities accept that a minor modification should be made to correct the following error/factual change: 'addition of a comma after the word 'Terraces' and before the word 'Grade' in criterion 2 of the policy text. Make a minor modification to the supporting text to

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.37 and criteria 2 which requires the protection and enhancement of the significance of the heritage assets and the submission of a Heritage Impact Assessment as part of any development. The Heritage Statement has raised the issue of known archaeological interest in this location, A reference highlighting this in the supporting text could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	paragraph 2.37 to add “Assessment will also be required of any archaeology interest which may remain” following the second sentence. As a main modification; if the Inspector is minded to replace the word ‘respect’ with ‘conserve and enhance’ in Criterion 2, the GN authorities would not object.
GNLP0133DR (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	24078	Support	Allocation is supported by the site promoter on behalf of the landowner. Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable	Support noted	No change
GNLP0133DR (policy)	Yare Valley Society (Mr John Elbro, Chair) [14909]	24135	Object	<p>If Policy GNLP0133DR were enacted it would reduce the existing green infrastructure and increase pressure on the remaining green infrastructure of the Valley Corridor. Such development would be contrary to NPPF and to Policies in the draft GNLP Strategy.</p> <p>The Local Plan is unsound in that Policy GNLP0133DR is A. Contrary to the National Planning Policy Framework (NPPF) section 15. Conserving and enhancing the natural environment. B. Inconsistent with policies in the draft GNLP Strategy.</p> <p>The Yare Valley Corridor is a key Strategic Green Infrastructure Corridor in the Norfolk biodiversity network, and is protected in the present Norwich Local Plan under Open Space Policy DM8 and Yare Valley Character Area Policy DM6.</p> <p>The Greater Norwich Infrastructure Plan (GNIP) has identified the Yare Valley as a GI priority initiative in the form of a linear Parkway linking Bawburgh in the West through to Whitlingham in the South East to help manage the development pressure in the area. (GNIP para. 3.3 and 3.4). The Valley can also be expected make a major contribution to the Governments “Green Future” Plan (May 2020) in the realisation of a Nature</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’ which in itself is part of the original campus design which was not completed. In comparison to existing allocation R41 in this location, the additional site area is to the north, extending towards the existing developed university campus rather than further into the Yare valley to the south.</p> <p>The policy wording addresses improved public access & biodiversity enhancements in the requirements</p>	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>Recovery Network (NRN) and in achieving Biodiversity Net Gain (BNG). The Corridor is more than the sum of its parts, and needs its green space conserved and enhanced if it is to function effectively in the future in its multiple roles.</p> <p>DM6: “Within the Yare Valley character area, as defined on the Policies map, development will only be permitted where it would not damage the environmental quality, biodiversity or character of the area and where it is for a) agriculture or forestry purposes; or b) facilities ancillary to outdoor sport and recreation; or c) the limited extension of or alteration to existing buildings” Policy GNLP0133DR does not fall into any of these categories and is thus a step back from previous Norwich green space commitments. As regards the NPPF, it does not “contribute to and enhance the natural and local environment” Instead it reduces and degrades it. It is not “protecting and enhancing valued landscapes ...” and it fails to recognise “the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services”</p>		
GNLP0133E (Map)	Miss Dee Randell [15466]	23698	Object	<p>Loss of recreational areas, such as woods and paths, to accommodation buildings. Loss of wildlife that inhabits the wooded areas that will be destroyed. Lack of access to the Yare Valley green corridor while building works are ongoing. Disruption to the wider wildlife that lives near those areas.</p> <p>Greater numbers of students, putting pressure on local amenities, roads and green space.</p> <p>Suggested change: Removal of building works in this area of the Yare Valley. Protection of wildlife and trees and the green space. Protection of the green corridor to the Yare Valley.</p>	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.	No change
GNLP0133E (policy)	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23790	Support	We fully support this allocation as it requires the development to be sited in Flood Zone 1 as we previously requested, and is not allowing less vulnerable in the flood zone as stated in the SFRA.	Support noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
GNLP0133E (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	24077	Support	<p>Site promoter on behalf of landowner. Support for the allocation. Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable. The policy is considered to require a modification to wording to be considered sound:</p> <p>Amendment to point 2 of the policy to enable more flexibility regarding scale and massing of development tested against landscape and visual impact.</p> <p>Amendment to point 6 of the policy regarding pedestrian and cycle links to an adjacent development site/</p>	<p>Support noted.</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the changes suggested. The scale and massing is in accordance with the UEA DFS in the evidence base.</p> <p>Improvements to pedestrian and cycle links are considered appropriate to facilitate best public access to green infrastructure in the Yare Valley.</p>	No change
GNLP0133E (policy)	Yare Valley Society (Mr John Elbro, Chair) [14909]	24134	Object	<p>Substantial representation opposing the allocation of site GNLP0133-E</p> <p>The Local Plan is unsound in that Policy GNLP0133-E is</p> <p>A. Not consistent with the National Planning Policy Framework (NPPF) section 15. Conserving and enhancing the natural environment.</p> <p>B. Not justified by, and inconsistent with, policies in the draft GNLP Strategy. (As evidenced within representation)</p> <p>C. Not justified as an appropriate strategy, taking into account the reasonable alternatives. (Representation refers to the UEA development Framework Strategy DFS and highlights alternative sites within existing UEA campus which have not been considered, but would have no impact on sensitive Yare Valley landscape if selected instead)</p> <p>Suggested change: For the reasons given in the full representation, the inclusion of the Policy GNLP0133-E cannot be justified, and should be deleted if the GNLP is to be sound.</p>	<p>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.</p> <p>Development will be sequentially located outside of areas of the site subject to flood risk and promotes pedestrian and cycle access through the site.</p>	No change
GNLP0282 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23983	Support	<p>Policy GNLP0282 Land at Constitution Motors Sound Welcome bullet point 1 and reference to locally listed building.</p>	Support noted	No change
GNLP0401 (2.51)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23367	Support	<p>Typographical/grammatical error: 2.51: 'The site is likely to accommodate at least 100 homes, or if the site is developed to include student accommodation (at least 250 bedrooms)'. Suggest removing brackets as</p>	Typographical error noted, minor modification to be made	Minor modification: delete brackets around "at least 250 bedrooms" at paragraph 2.51

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				the sentence is not really reading well or right as drafted.		
GNLP0401 (policy)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23366	Support	Reference made to the wording relating to 'making the most of its riverside location' in policy 0401 as a good example which should be used in other riverside policies for consistency	Comment noted	No change to policy GNLP0401
GNLP0401 (policy)	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23791	Support	The supporting text includes our previous comments and therefore we are satisfied with this site allocation. We therefore fully support this allocation.	Support noted	No change
GNLP0401 (policy)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23901	Object	There is existing water mains within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required. Suggested Change: Suggested wording provided for supporting text and policy relating to the existing water main/water supply	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity by including the following wording in the supporting text: 'There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance'	Make a minor modification to the supporting text inserting an additional paragraph stating: "There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance"
GNLP0401 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23984	Support	We welcome the new wording in criterion 2 in relation to heritage assets.	Support noted	No change
GNLP0409AR (policy)	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23788	Support	The text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis.	Support noted Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites	Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
GNLP0409AR (policy)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23904	Object	<p>There is existing surface water sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p> <p>Suggested Change: Suggested additional criterion to be added to policy: <i>‘the safeguarding of suitable access for the maintenance of foul drainage infrastructure’</i></p>	<p>No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity by including the following wording in the supporting text: ‘There is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance’</p>	<p>Minor modification to the supporting text inserting and additional paragraph stating: “There is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”.</p>
GNLP0409AR (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23985	Object	<p>We welcome the reference to the heritage assets in paragraphs 2.56 – 2.62.</p> <p>We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.</p> <p>Criterion 3 Should read character or appearance in line with legislation</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p> <p>Again we suggest a more detailed HIA is prepared for this site.</p>	<p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested in this representation to criterion 2 and 3, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector</p> <p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraphs 2.56 – 2.57 and criteria 2 and 3 which require the preservation and enhancement of the significance of the heritage assets.</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites</p>	<p>A Heritage Statement has now been completed for this site. Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p> <p>If the Inspector is minded to make the changes suggested by Historic England (listed below) as a Proposed Modification, then the GN authorities have no objection to this.</p> <p>Criterion 2: Great weight will be given to the conservation of all designated heritage assets. Proposals will enhance the setting of the City Wall scheduled</p>

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					affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	monument and, the two listed cottages at 77-79 Barrack Street must be retained, brought back into residential uses and renovated. There will be a general presumption in favour of the repair and re-use of heritage assets on site as part of any site regeneration, however any application for redevelopment will be considered on its merit. Proposals should provide a suitable setting for designated heritage assets affected by the proposals on and off site including key views from and into the site. Criterion 3: Development proposals should draw upon local character and distinctiveness and preserve or enhance the character or appearance of the conservation area.
GNLP0409BR (policy)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23903	Object	There is existing surface water sewer within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required. Suggested Change: Suggested additional criterion to be added to policy: <i>‘the safeguarding of suitable access for the maintenance of foul drainage infrastructure’</i>	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity by including the following wording in the supporting text: ‘There is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance’	Minor modification to the supporting text inserting “There is an existing surface water sewer in Anglian Water’s ownership within the boundary of site GNLP0409BR. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”.
GNLP0409BR (policy)	Historic England (Mrs Debbie Mack, Historic	23986	Object	Criterion 2 would be improved by using the phrase ‘conserve and enhance the significance of heritage	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested in this representation to	A Heritage Statement has now been completed for this site. Make a minor

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	Environment Planning Adviser) [19652]			assets (including any contribution made to that significance by setting) Again continue to suggest a more detailed HIA is prepared for this site.	<p>criterion 2, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector</p> <p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraphs 2.56 – 2.57 and criteria 1 and 2 which require the preservation and enhancement of the significance of the heritage assets. The Heritage Statement has raised the issue of known archaeological interest in this location, A reference highlighting this in the supporting text could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>modification to the supporting text to paragraph 2.57 to add “Assessment will also be required of any archaeology interest which may remain to site GNLP0409BR” following the second sentence.</p> <p>If the Inspector is minded to make the changes listed below as suggested by Historic England to as a Proposed Modification, then the GN authorities have no objection to this</p> <p>Criterion 2:</p> <p>Proposals will conserve and enhance the significance of heritage assets (including any contribution made to that significance by setting) affected by the proposals on and off site including key views from and into the site in particular the significant long views across the site towards Norwich Cathedral.</p>
GNLP0409BR (policy)	CODE Development Planners Ltd (Miss Helen Adcock, Director) [12557]	24343	Object	<p>Objection from site promoter on behalf of landowner. Contests that the policy is not sound, not legally compliant and fails the duty to co-operate.</p> <p>Details efforts by the landowner to bring the site forward for development since 2006 without success, overview of extant and expired consents relating to this site.</p> <p>The allocation policy is unsound as the ‘mixed-use’ requirement is not evidenced to be viable or deliverable</p>	<p>As a brownfield site in a highly accessible location, a mixed use allocation is considered highly appropriate for this site.</p> <p>Throughout the GNLP there is a focus on modal shift towards sustainable and active travel choices. Development of large scale car parks is not consistent with this approach. Development of large scale car parks in highly accessible locations such as Barrack street is not a priority</p>	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>and thus fails the “effective” test. The allocation is inconsistent with the strategic policies & does not support growth in this location.</p> <p>The inconsistency of parking standard between the local authority areas within the plan undermines the attractiveness of city sites for business/employment uses.</p> <p>The policy map does not reflect the up to date area available for allocation – “<i>the reasonable alternative submitted by Jarrold & Sons to the Regulation 18c GNLP plan does not appear be considered</i>”.</p> <p>The SA for this site is inaccurate and misleading in its references to expired consents for this site: “<i>there are no extant or detailed consents on the site relating to residential development</i>”</p> <p>Suggested revisions to the allocation policy wording have been provided in the representation.</p>	<p>for Norwich City Council and would not constitute an efficient use of land in this location.</p> <p>Point 6 of the representation states that the policy map is incorrect and that the ‘<i>alternative submitted by Jarrold & Sons to the Regulation 18c GNLP does not appear to have been considered</i>’. The boundary suggested by Jarrold and Sons at Regulation 18C is in fact the boundary for proposed allocation GNLP0409BR</p>	
GNLP0451 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23987	Object	<p>(Unsound) We broadly welcome the revised wording in relation to heritage at criterion 1. We suggest the addition of the words ‘the significance’ after ‘enhances’.</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p>	<p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested in this representation, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector inserting the words ‘<i>the significance</i>’ after ‘enhances’ in criterion 1</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p> <p>If the Inspector is minded to make the changes suggested by Historic England listed below as a Proposed Modification, then the GN authorities have no objection to this.</p> <p>Criterion 1:</p> <p>Achievement of a high quality, locally distinctive design of a scale and</p>

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
						form which respects its location within the City Centre Conservation Area, conserves and enhances the significance of adjoining heritage assets, including a number of grade II listed buildings, and their settings through careful design, massing and appropriate open space and landscaping; and protects amenity and outlook for existing and future residents
GNLP0451 (policy)	Mrs Sarah Clinch [19334]	24108	Object	<p>(Unsound) Site promoter on behalf of site developer.</p> <p>The site allocation has an extant consent for student accommodation which expected to commence on site in Summer 2021.</p> <p>The site allocation policy is considered unsound for three reasons: i) Unjustified and ineffective heritage requirements. ii) Unjustified and ineffective approach to affordable housing. iii) Unjustified and ineffective approach to landscaping and biodiversity.</p> <p>The representation proposes amendment to the policy wording (primarily through deletion of some elements of criterion 1,2 and 5) in order to be considered sound.</p>	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested.	No change
GNLP0506 (Map)	pal-planning ltd (Mr Peter Luder, Director) [19950]	23813	Object	Include land 'under the flyover' on Magdalen Street within Policy GNLP0506 Land at and adjoining Anglia Square.	The area suggested has not previously (or formally) been submitted for consideration.	No change
GNLP0506 (2.72, 2.73, 2.74)	pal-planning ltd (Mr Peter Luder, Director) [19950]	23793, 23797, 23800	Object	This representation relates to the full supporting text, not just the first numbered paragraph. The respondent considers the supporting text as written is insufficient and has provided an alternative supporting text for consideration.	The supporting text as worded is considered to be sound. If the Inspector is minded to include additional detail requested in this representation the Greater Norwich Authorities would not object	No change
GNLP0506 (policy)	pal-planning ltd (Mr Peter Luder, Director) [19950]	23812	Object	<p>The site allocation boundary should be increased to include land under the flyover.</p> <p>A comprehensive set of policy wording has been proposed in this representation.</p>	<p>The area suggested has not previously (or formally) been submitted for consideration.</p> <p>The policy as worded is considered to be sound and therefore it is not considered necessary to make the change suggested</p>	No change

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GNLP0506 (policy)	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23905	Object	<p>There is existing water mains and foul and surface water sewers within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p> <p>The representation puts forward suggested additional text for the supporting text and an additional criterion for the proposed allocation policy.</p>	<p>No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity by including the following wording in the supporting text: 'There are existing mains and foul and surface water sewers in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance'</p>	<p>Minor modification to the supporting text inserting and additional paragraph stating: "There are existing mains and foul and surface water sewers in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance'.</p>
GNLP0506 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23988	Object	<p>Continued significant concerns about this allocation, in particular the scale of the allocation and potential to cause harm to the historic environment.</p> <p>Although scale of development has been reduced from 1250 to 800 in response to Secretary of State's decision in response to the called in planning application, this is still considered too high with the recommendation that this should be closer to 600.</p> <p>It is not clear from the policy wording what scale of other development can be accommodated on site.</p> <p>A Heritage Impact Assessment should be undertaken prior to EiP to inform the allocation and policy wording. Without an HIA, the allocation is not sufficiently justified as the potential impact on the historic environment has not been sufficiently assessed.</p> <p>Criterion 5 & 9 – car parking should be kept to a minimum on site. Welcome reference to low car or car free residential development in policy, however concern raised regarding the reference to decked car parking for the retail element.</p> <p>Criterion 6 Given the concern about the height of development expressed in the judgement, the policy should be amended to make clear that any landmark building should not achieve this status through height exceeding that of existing buildings which form the immediate context of the site.</p>	<p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.73 and criteria 6 and 7 which requires the conservation and enhancement of the significance of the heritage assets.</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.</p> <p>Reference made to Ash Sakula work supporting an allocation closer to 600 – this was presented at the public inquiry for the Anglia Square planning application, it was acknowledged at the time that this scheme was not viable in the current market conditions.</p>	<p>Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application. The GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to add the words 'including those' before 'at Magdalen Street in Criterion 7'.</p> <p>Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings including those at Magdalen Street, Doughtys Hospital, Doughtys Cottages, St Augustine's Street (including grade I listed Church of St Augustine), Gildencroft,</p>

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				<p>Criterion 7 We broadly welcome the addition of criterion 7 in relation to heritage assets. We suggest that the policy would be improved by adding the words 'including those' before 'at Magdalen Street'. By using the word including, you ensure that you are not accidentally excluding other heritage assets. The criterion should also require a density of development to reflect the character and grain of the area.</p> <p>Criterion 11 It would be helpful to include reinstating the historic street pattern in this criterion.</p> <p>Archaeology The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p> <p>The representation provides suggested revised wording for criterion 5,6,7,11.</p>	<p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector to add the words 'including those' before 'at Magdalen Street in Criterion 7'.</p>	<p>including any contribution made to their significance by setting</p>
GNLP0506 (policy)	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24506	Object	<p>Policy GNLP0506 gives the first opportunity for the public to comment on revised uses (following SoS refusal of the recent planning application) but without discussion and debate. We consider that Policy GNLP0506 repeats some of the same elements which contributed to a lack of public support for the rejected scheme.</p> <p>The 800 homes should be the maximum residential development and this figure should include any student accommodation should it be proposed on this site.</p> <p>The policy lacks recognition of the importance of the local artistic community and their need for facilities as part of the creation of a diverse, integrated community.</p> <p>Delete reference to provision of a multi-storey car park A multi storey car park does not fit with net zero. Low levels of car parking would minimise carbon emissions and traffic impacts such as community severance, free up valuable land, facilitate a better site layout and design and create a safe environment. Anglia Square is one of the most highly sustainable and accessible locations in the city centre</p>	<p>Purpose built student accommodation is counted at a ratio of 2.5 bedrooms is equivalent to one dwelling, if purpose built student accommodation were specified for this site it would be counted at this ratio as part of the overall housing figure.</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested.</p>	No change

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				<p>The policy reference to 'energy efficient design' is weak. The development should achieve zero carbon in a number of ways:</p> <p>Remove reference to 'landmark building' Of greater importance is the need to design an attractive, liveable, lively, resilient urban quarter which is sympathetic to its historic surroundings and meets the needs of the local community</p> <p>Layout and design of the new development should reflect the former medieval street pattern. Norwich's medieval street pattern remains intact apart from the area which was cleared to build Anglia Square. It forms the basis of the city centre conservation area and is a major determinant of the city's historic character.</p> <p>Bullet 8 Add reference to green open space As well as high quality landscaping, planting and biodiversity enhancements, a new scheme must include public and private green open space for amenity use, minimise urban overheating and support biodiversity.</p> <p>Bullet 13: In addition, redevelopment should create a low car environment and minimise its contribution to traffic on the surrounding road network. Anglia Square is located in a highly accessible location at the heart of the city centre.</p>		
GNLP1061R (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23989	Object	<p>(Unsound) There are no heritage assets within the site boundary. However, to the north west of the site lies the Horsham St Faith Conservation Area and a number of associated listed buildings including the grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings. Development on the airport site has the potential to impact upon these heritage assets.</p> <p>To that end, we suggest that a criterion is added to the policy to conserve and enhance the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and</p>	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested in this representation, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector inserting an additional criterion 'to conserve and enhance the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to tier significance by setting) into the policy.	<p>No change</p> <p>If the Inspector is minded to make the changes suggested by Historic England to include an additional policy criterion, as set out below, as a Proposed Modification, then the GN authorities have no objection to this.</p> <p>Additional Criterion: Development must conserve and enhance the significance of the Horsham St Faith</p>

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				scheduled Priory as well as numerous grade II listed buildings (including any contribution made to tier significance by setting)		Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to their significance by setting).
GNLP1061R (policy)	Barton Willmore (Ms Victoria Yeandle) [16976]	24375	Support	<p>Support from the site promoter on behalf of landowner – subject to some suggested changes to the policy.</p> <p>The site area should be extended to include the land at Petans.</p> <p>The policy needs to provide a mixture of aviation and non-aviation uses in line with the airport Masterplan endorsed by both Norwich City Council and Broadland District Council. The current policy wording is inappropriately restrictive to aviation uses.</p> <p>The policy currently restricts ancillary retail/support uses. Such use should be accepted as part of the allocation policy to improve the sustainability of the site overall by providing services and facilities for all future employees.</p> <p>The policy should provide flexibility to respond to demand, recent experience has demonstrated how quickly the market can change – the allocation should include a review mechanism at 5 yearly intervals</p> <p>The policy requires preparation of a Surface Access Strategy prior to development, this should be revised in line with the consent to be prior to occupation of phase 2.</p>	<p>Support for allocation in principle noted.</p> <p>The site at Petans is already developed and operational, it is not considered necessary to extend the allocation boundary to include this area.</p> <p>Ancillary retail uses are not supported in this location, as an out of centre location this is likely to increase traffic movements towards the site and away from existing more sustainably located centres; this would further disrupt the objective to promote the vibrancy and viability of existing centres.</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested.</p>	No change
GNLP2114 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23990	Support	We welcome the changes made to the policy wording to include specific reference to heritage assets.	<p>Support noted</p> <p>Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition</p>	Make factual correction/minor modification. Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	required as part of a planning application.
GNLP2114 (policy)	Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]	24366	Object	<p>(Unsound) The site is allocated for residential led mixed-use development with potential to provide a minimum of 110 homes together with a minimum of 5,000 sqm offices, managed workspace and potentially other ancillary uses.</p> <p>We would suggest that the site can deliver either in the region of 110 dwellings or 5,000 sq m of employment floorspace, or a mix of these uses. The mixed use scenario is the most likely outcome.</p> <p>Without incorporating the suggested changes to the policy or engaging with the site owner on how the current draft policy has been formulated we would suggest that the policy fails to meet the tests of the NPPF and the policy would be considered unsound.</p> <p>The policy is mistaken in the quantum of floor space that can be delivered across the site and therefore it is not positively prepared, it will not enable the GNLP to meet its objectively assessed needs; this would also render the policy ineffective and undermine the overall strategy .</p> <p>Suggested revised wording supplied as part of this representation.</p>	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested. A mixed use scheme is supported in this location; it is important to retain employment uses alongside residential provision in this part of the city.	No change
GNLP2163 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23991	Support	We welcome the changes made to the policy wording to include specific reference to heritage assets, grain and massing and archaeology on this site. Paragraph 2.85 also provides helpful supporting text in relation to heritage.	Support noted	No change
GNLP2163 (policy)	Lanpro Services Ltd (Mr Philip Atkinson, Director) [12609]	24250	Support	Site promoter on behalf of landowner: I can confirm that my client Newall Properties Development as owners of the Friars Quay Car Park (formerly Wilsons Glassworks) on Colegate in Norwich supports the emerging allocation for the site reference GNLP2163 entitled Friars Quay Car Park, Colegate as currently worded. My client contends that a minimum of	Support noted	No change

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				25 no. dwelling units as outlined in the emerging Policy can easily be achieved on the site and as advised previously this site is immediately available and deliverable to meet future housing needs in the City. My client further considers that the emerging Policy as currently worded accords fully with all relevant Government guidance and importantly the tests of soundness contained in paragraph 35 of the National Planning Policy Framework.		
GNLP2164 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23992	Support	GNLP 2164 Land west of Eastgate House, Thorpe Road Sound We welcome the reference to the Conservation Area in this policy.	Support noted	No change
GNLP2164 (policy)	Lanpro Services Ltd (Mr Philip Atkinson, Director) [12609]	24251	Support	Site promoter on behalf of landowner: I can confirm that my client Alan Boswell as owner of the vacant development site west of Eastgate House on Thorpe Road in Norwich supports the emerging allocation for the site reference GNLP2164 entitled Land west of Eastgate House, Thorpe Road as currently worded. My client contends that a minimum of 20 no. dwelling units as outlined in the emerging Policy can easily be achieved on the site and as advised previously this site is immediately available and deliverable to meet future housing needs in the City. My client further considers that the emerging Policy as currently worded accords fully with all relevant Government guidance and importantly the tests of soundness contained in paragraph 35 of the National Planning Policy Framework.	Support noted	No change
GNLP3054 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23993	Object	Supporting text at paragraphs 2.93 - 2.98 provide helpful context in relation to heritage and the site. It is suggested that a detailed HIA is prepared for the site Criteria 3,4 and 6 welcomed Criteria 1 and 5 should read "character <u>or</u> appearance in line with legislation (rather than character <u>and</u> appearance as currently written) Criterion 2 We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph. The final	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.93 – 2.98 and criteria 1,2,3,4,5,6 and 11 which address heritage assets. Things of archaeological importance are included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as	Minor modification as a factual correction to the second sentence of criteria 2, delete reference to listed buildings on site as there are none within the defined red line boundary: "Proposals will include the protection of the locally listed buildings on the site and the enhancement of the significance of the setting

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>sentence of this is not quite right - significance can in part be derived from setting. The sentence would be better is it read 'conserve and enhance significance of the designated and non-designated heritage assets both on-site and off-site (including any contribution made to that significance by setting)</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy</p>	<p>well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.</p> <p>The second sentence of Criteria 2 of the policy states: "<i>Proposals will include the protection of the listed and locally listed buildings on the site and the enhancement of the significance of the setting of designated heritage assets both on and off site</i>"</p> <p>It should be noted that there are no statutory listed buildings on site, as such a factual correction is required as a minor modification to delete the reference to listed buildings on site.</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector in accordance with those suggested by Historic England in this representation relating to the wording of criteria 1,2,</p>	<p>of designated heritage assets both on and off site"</p> <p>Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p> <p>If the Inspector is minded to make the changes proposed by Historic England listed below, as a Proposed Modification, then the GN authorities have no objection to this.</p> <p>Criterion 1: Achievement of a high quality, locally distinctive design of a scale and form which respects its historic and industrial context, the significance and setting of heritage assets on and off site, and the character or appearance of the City Centre Conservation Area;</p> <p>Criterion 2: Great weight will be given to the conservation of all designated heritage assets. There will be a general presumption in favour of the repair and re-use of heritage assets</p>

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
						<p>on site as part of any site regeneration, however any application for redevelopment will be considered on its merit. Conserve and enhance significance of the designated and non-designated heritage assets both on-site and offsite (including any contribution made to that significance by setting).</p> <p>Criterion 5: Development proposals should draw upon local character and distinctiveness and preserve or enhance the character or appearance of the conservation area.</p>
GNLP3054 (policy)	Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]	24367	Object	<p>Unsound – site promoter on behalf of landowner.</p> <p>The continued allocation of this site for redevelopment is welcomed by the site owner. We can confirm that the site is available for redevelopment and could be brought forward within the next five years.</p> <p>The minimum requirement for 150 dwellings is noted, despite our previous representations on this matter. We would suggest that this number should not be stated as a minimum but that the site should deliver in the region, or order, of 150 dwellings.</p> <p>The site is a brownfield opportunity area in the city centre, it is unclear what the GNLP is attempting to achieve by stating that residential development should be provided in response to identified local community needs. There is a need for a wide variety of housing types in the GNLP area and the nature of the residential redevelopment of the site will be a commercial decision that will ultimately respond to market demands, that could include traditional C3 use class housing, Build to Rent, purpose-built student accommodation and / or co-living. This requirement to justify the housing type against a local community need</p>	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>is not considered to be justified or consistent with national policy.</p> <p>The conversion of the locally listed building, St Mary's Works factory, is an objective of the policy. The building is of significant scale and does not lend itself easily to conversion for either residential or employment uses. We would suggest that the policy wording should be amended to allow for there to be a full or in part retention option.</p> <p>The representation provides a revised version of the policy wording for consideration.</p>		

East Norwich Strategic Allocation

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
East Norwich (2.6), (2.7), (2.8)	Lesley Grahame [20000]	24323, 24331, 24332	Object,	<p>Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the success or otherwise of the project.</p> <p>Opportunity to provide pedestrian and cycle links to Whitlingham enabling reduced carbon emissions through sustainable modes of transport (this opportunity should not be lost)</p> <p>Introduction of a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, add noise and pollution, reduce air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas.</p> <p>While there may be a balance of conflicting needs, this policy cannot meet the soundness test for effectiveness as its delivery would cause significant harm to the objectives.</p>	Comments noted	No change
East Norwich (2.8)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23978	Support	We welcome the references in the supporting text to heritage at paragraphs 2.8, 2.10(vii), 2.13, 2.18-2.21	Support noted	No change
East Norwich (2.9)	Lesley Grahame [20000]	24324	Object	Resident consultation is vital in the design and development of this new site. Without good, early	Comments noted. Norwich City Council has published details of the ESRA masterplan	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				consultation with the local community, opportunities for improvement and suitable development may be missed.	process. The outline programme details three stages of engagement with stakeholders and the local community.	
East Norwich (2.10)	Lesley Grahame [20000]	24325	Object	<p>Low car development would reduce harm – requires adherence along with excellent non-car alternatives.</p> <p>viii – Energy efficiency standards should reflect the best aspirations in order to meet the legal requirement of zero carbon by 2050, and the physical, non-negotiable 6th Carbon budget.</p> <p>ix - The area covered by the Norwich East Partnership is prone to flooding. If this area is developed, detailed plans will be needed to mitigate against this risk.</p> <p>A new inclusive riverside community needs to include residential moorings and related facilities in order to be effective in delivering the sustainable development objectives that meet the needs of all.</p>	Comments noted	No change
Land at Deal Ground (2.11)	Lesley Grahame [20000]	24326	Object	<p>Developing the Deal Ground has received mixed views from residents who welcome the cycle bridge but have also raised concerns about the height, design quality and durability, flood resilience, traffic issues.</p> <p>The new settlement must be built to at least passivhaus standards and have a traffic neutral impact, if not traffic negative; be consistent with the Climate Change Act and national planning policy and therefore sound.</p> <p>Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.</p>	<p>Comments noted</p> <p>Sustainable development principles are set out in strategic policies 2 and 3</p> <p>Flood risks addressed in level 2 SFRA and will be addressed further through master planning process and planning application stage and mitigated through development..</p>	No change
Land at Deal Ground (2.14)	Lesley Grahame [20000]	24327	Object	<p>Flood events are becoming more frequent and the percentage calculations may /may not have been updated to take this into account. A precautionary approach is necessary if the plan is to be deliverable for the long term and effective.</p>	<p>Comments noted.</p> <p>The site has been reviewed as part of the level 2 Strategic Flood Risk Assessment. Further work relating to flood risk assessment and mitigation will form art of the master planning process and detailed designs at planning application stage.</p>	No change
Utilities Site: (2.25), (2.26), (2.27)	Lesley Grahame [20000]	24328, 24329, 24330	Object	<p>This site has been previously allocated to renewable energy production. Some local people had hoped to benefit from CHP (community heat and power) but this was never part of the plan. There was near universal rejection of biomass burning for reasons of air quality, land use change (deforestation, loss of indigenous and agricultural land) to source wood pellets - all of which have since received more recognition as negative for sustainability.</p>	<p>Comments noted, energy generation is not a primary requirement in this location; it is unlikely that he proposed development will include a power station.</p> <p>Sustainable development principles are set out in strategic policies 2 and 3.</p>	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				Given the increasing population density of the area, it would be sensible to rule out any combustion process and require energy to be generated from recognisably clean sources such as solar, wind, heat pumps The rejected option of biomass burning could be considered as an alternative, against which genuinely clean renewable non-combustion energy is positive, justified, effective and consistent Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target.		
Utilities, 0360/3053/R10 Map	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23360	Support	The policy map needs to show the part of the utilities site that is in the Broads. This does not affect the soundness of the Local Plan. It could, however, be easily added to the Local Plan to provide context, especially given the stance in the Plan that the sites in East Norwich are seen as one, including the part in the Broads.	The area of the utilities site in the Broads Authority jurisdiction is outside of the GNLP boundary, therefore it has not been shown in the allocation policy map. The policy map as drawn is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector. If such a change is proposed it is considered that it should be made clear that the additional site area lies outside of the GNLP boundary and is shown for reference only.	No change. If the Inspector is minded to make a change to the allocation policy map, as a Proposed Modification, then the GN authorities have no objection to this.
Utilities 0360/3053/R10 (policy)	Carrow Yacht Club (Mr John Henson) [19839]	23339	Object	Carrow Yacht Club should be treated in the same way as asphalt & aggregates plant in the policy – a criterion should be added to the policy to protect its functioning including “ <i>the free movement through the site of heavy goods vehicles (specifically low loaders) and heavy cranes for recovery and launching of boats</i> ”. Suggested wording has been provided in the representation. The club is concerned that proposals for improved access on foot and bicycle do not adversely affect the vulnerability of the site to intruders and would welcome that this to be taken into account when any plans are made for new bridges and rights of ways.	The policy as written is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector. To include an additional criterion relating to the functioning of the Carrow yacht club	No change If the Inspector is minded to make a change, inserting an additional criterion protecting the functioning of the Carrow Yacht Club as a Proposed Modification, then the GN authorities have no objection to this.
Utilities 0360/3053/R10 (policy)	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23363	Support	Point 6 of policy. Typographical/grammatical error: ‘heritage assets affected by the proposal on and off site including key views from and into the site’. (The underlined ‘ed’ in affected is missing in the policy text). Point 8 of policy – something to consider. You may wish consider biodiversity on this brownfield land that may establish or has been established over the years. Open mosaic habitat of intrinsic biodiversity value is a NERC Act habitat. Brownfield sites are listed as a Priority Habitat in Section 41 of the Natural	Typographical/grammatical error noted and correction appropriate. The policy as written is considered sound, no further changes are considered necessary	. Minor modification: Correction of typographical error to correct spelling of “affected” at criterion 6

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				Environment and Rural Communities Act 2006 (NERC Act), as 'open mosaic habitat on previously developed land'.		
Utilities 0360/3053/R10 (policy)	Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]	23678	Object	Support for increase in housing numbers sine Reg 18C. Support the boundary including areas with extant permissions. The development area includes a County Wildlife Site (CWS), which does not preclude development, and so a clear and unambiguous policy is required to assess the acceptability of proposals that will affect it.	Support and Comments noted. The policy is considered to be sound as written, no changes necessary in response to comments.	No change
Utilities 0360/3053/R10 (policy)	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23787	Support	Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNL0360 due to being Flood Zone 3b, and there is no mention on the need to not increase flood risk elsewhere and therefore provide flood storage. There is lots of mention of 'flood resilient construction' when this tends to mean the buildings can recover from a flood, while we would require buildings to have raised floor levels to prevent them flooding in the first place. It is however possible that perhaps this is just differing terminology and the intention is the same as us. It is positive that the SFRA Site Summary Table includes lots of detail as to what is required to develop the site, so therefore this information should be covered here.	Support and further comments noted. Developable areas and further detail relating to flood zone responses shall be covered in the ongoing master planning document.	No change
Utilities 0360/3053/R10 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23979	Object	There are numerous designated heritage assets affected by these sites, any development of these sites has the potential to affect these designated heritage assets and their settings. We are very concerned about the very high number of dwellings (4000, rather than previously 2000 in Reg 18 Plan) anticipated from this area. This is likely to give rise to very high-density development on the sites, which may have a harmful impact on the historic environment. Continue to strongly advise that the HIA should be prepared for the whole site ahead of the EiP to inform the allocation and in particular the capacity of the site. The HIA should then inform the masterplan.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.10 vii, 2.13,2.18, 2.19, 2.20,2.21, and criteria 6, Deal Ground criteria 3, Carrow Works criteria 1 & 2, Utilities site criteria 1. The policy as worded is considered to be sound and therefore it is not necessary to make the changes suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector to	No change The GNLP authorities would not object to a proposed modification being put forward by the Inspector to the third sentence of criterion 6 to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>We suggest that the first sentence is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.</p> <p>In the third sentence, the wording for the conservation areas should be amended to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas'</p> <p>Criterion 12 relating to archaeology welcomed.</p> <p><u>Deal Ground</u> – Criterion 3 broadly welcomed: but suggest that the phrase 'and reuse encouraged' be replaced with 'required together with a future maintenance scheme for the asset.</p> <p><u>Carrow Works</u> – H.E have particular concerns about this site, given the heritage assets within. Reference to demolition of locally listed buildings in bullet 1 is unhelpful & gives wrong emphasis in relation to conservation and enhancement of heritage assets. Suggest that this is reframed in a more positive manner.</p> <p>There are a number of unlisted former Colman's industrial buildings that are of some historic interest – potential to retain and adapt these buildings should be identified at para 2.10, vii.</p> <p><u>Utilities Site</u> – Reference to heritage significance of site welcomed.</p> <p><u>ATB Lawrence Scott</u> – detail of this section of the site is lacking/unclear</p>	the third sentence of criterion 6 to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas	
Utilities 0360/3053/R10 (policy)	Firstplan (Mr Ian Keith, Assistant Planner) [19609]	24439	Support	<p>Site promoter on behalf of joint land owners. Confirmation of ongoing support for site allocation in GNLP.</p> <p>The principle of development on the site has already been accepted and it is expected that development will take place 'within the time-period of this Local Plan'. The site has been cleared and as such remains available, suitable and deliverable for development within years 0-5 of the plan.</p>	Support noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				The site will be capable of making a significant contribution towards the overall target of 4,000 new homes within the East Norwich Strategic Regeneration Area. The landowners will be seeking to maximise density on site.		
Utilities 0360/3053/R10 (policy)	Dentons (Roy Pinnock) [20016]	24477	Object	<p>Based on the currently-published information, the Plan is not demonstrably sound in terms of justification, effectiveness and consistency with NPPF in respect of (a) evidence of infrastructure need and associated costs; (b) deliverability.</p> <p>Viability study does not provide sufficient evidence to cover ESRA, this should not be deferred to SPD stage.</p> <p>The requirements for the ESRA SPD have not been adequately established in Policies 7.1 and GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective</p>	<p>Comments noted</p> <p>The policy as worded is considered to be sound. Viability considerations are dealt with in strategic policy 5 and in the viability study supporting evidence.</p>	No change
Utilities 0360/3053/R10 (policy)	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24505	Object	<p>Suggest several additions to scope of development to meet the area's objectively assessed needs:</p> <ul style="list-style-type: none"> - designed and built to zero carbon standards - achieve traffic neutrality across the wider road network - green open spaces that include an extension to Whitlingham Country Park <p>Suggested amendments to strategic policy 7.1 in relation to East Norwich</p> <p>We support the creation of a proposed new sustainably built urban quarter in this location. Public consultation on a masterplan has yet to take place and the GNLP policy is the first opportunity for public comment. We consider that the GNLP summary description of the development omits important requirements. East Norwich should achieve zero carbon in a number of ways.</p> <p>The brief for the masterplan includes an emerging development objective, 'promotion of a low car environment'. We agree with the creation of this in order to create an attractive and safe community but we consider that it does not go far enough because it essentially refers to internal travel within the development. We are concerned about the impact of up to 4,000 dwellings on the wider road network.</p>	<p>Comments noted</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested.</p>	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>Hence, we propose 'a low car development' with strong measures that encourage car -free living. This would better achieve Net Zero and minimise the impact of East Norwich on the surrounding roads and wider road network.</p> <p>Suggest opening former rail halt at Trowse to serve ENSRA & County Hall + bus connections to UEA, NRP & N+N Hospital.</p> <p>Potential impact of ESRA on Whitlingham Country Park should be mitigated by extending the country park to cater for increased demands.</p>		
Utilities 0360/3053/R10 (policy)	Rosconn Group (Ben Ward, Senior Planning Manager) [19994]	24543	Object	<p>No evidence that ESRA will realistically yield this level of development in the GNLP plan period.</p> <p>Significant Infrastructure requirements and flood risk indicates that site is more appropriate for long term than medium-long term.</p> <p>L2SFRA indicates areas of land in floodplain likely to affect amount of land available for development & mitigation needed. But no sequential test evidence is provided to demonstrate selection of these sites instead of sites elsewhere.</p> <p>Viability study does not appropriately cover the requirements of ESRA. Whilst it is noted that the NPS report states that strategic sites will be appraised independently, no part of the GNLP's evidence base appears to have undertaken this exercise. This shortcoming undermines the effectiveness & justification behind the ESRA allocation</p> <p>RSL considers the ESRA allocation to be unsound for want of compliance with national policy, justification and effectiveness. It is very unlikely that this site will deliver even close the anticipated quantum of development within the plan period thereby leaving a considerable hole in the GNLP's strategy. The ESRA should be identified as a longer-term growth aspiration that will start to yield dwellings beyond 2038 and alternative suitable sites should be allocated to make up the shortfall.</p>	<p>Comments noted</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested.</p> <p>Delivery of the plan is projected in the housing trajectory which is informed by statements of common ground agreed with landowners/developers; and information in the 5 year land supply. Master planning is progressing with positive engagement from multiple stakeholders.</p>	No change

Urban Fringe Sites

Colney

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
COL1 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24019	Support	Remaining issues in relation to the soundness of the Plan and the protection of the historic environment. We welcome the addition of criterion 16 and 19 in relation to heritage assets and archaeology.	Comment noted	No change
COL2 (GNLP 0140C) (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24020	Support	We welcome the addition of criterion 1 in relation to heritage assets	Comment noted	No change
COL2 (GNLP 0140C) (policy)	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	24079	Support	Delivery of the site within the Plan period to 2038 is achievable, and the site remains suitable, available, achievable and viable.	Comment noted	No change
BAW2 (policy)	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23899	Support	We support the policy requirement that any proposals for this site, which is designated in its entirety as a County Wildlife Site, would need to ensure that its ecological value is retained and enhanced if it is to be made open to the public, through a conservation management plan tied to any permission.	Comment noted	No change
BAW2 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24022	Support	On behalf of Historic England, we welcome criterion 2 regarding the conservation management plan.	Comment noted	No change
BAW2 (policy)	Mr graham martin [19999]	24319	Object	The 80 beds and 120 units of extra care housing is likely to add thousands more traffic movements on the B1108 an already congested road and would seriously impede through traffic to and from Norwich, UEA, the NNUH and the Research Park.	The Site policy as written is considered to be sound and as such no modifications are required..	No change
GNLP0253 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24021	Object	Unsound - Colney Hall is located at the heart of this allocation. It is a late 18th century house with attached orangery listed at grade II. The allocation is for specialist housing for older people, university research and healthcare facilities. We note that criterion 4 refers to sensitive conversion of the Grade II listed Hall and its gardens. We also note and welcome criterion 6 in relation to archaeology. Given the scale of this development and the fact that development would	Regard has been had to heritage issues as part of the site assessment process. Following the advice from Historic England further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, it is recognised that any development will need to be undertaken sensitively with regard to the heritage assets.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				surround the listed building, we suggest that an HIA is prepared.		
GNLP0253 (policy)	Mr Feng Li [13566]	24189	Support	We would wish to participate in the hearing session to support the site and help answer to any potential objections.	Comment noted	No change
GNLP0253 (policy)	Mr Graham Martin [19999]	24318	Object	Unsound – not specified Changes to plan: The Colney Hall GNLP0253 proposal should be removed from the proposed GNLP 2021	Comment noted	No change

Costessey

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Costessey settlement map	Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	24248	Object	Unsound – Effectiveness – Questions reliance on the delivery of carried forward Sites. GNLP0238- land at Farmland Road, Costessey, offers an appropriate opportunity to deliver growth in a manner that is appropriate to the sustainable objectives of the emerging Local Plan and NPPF's recognized that the site has been the subject of a dismissed planning appeal for a development of 83 dwellings (Appeal Ref: APP/L2630/W/18/3204808 & APP/L2630/W/18/3204810) however, we believe that a limited form of development could still be achieved despite the concerns raised by the Planning Inspector.	The Site Assessment booklet sets out constraints identified and the reasons for not allocating this site. The site has not been considered suitable for allocation as a recent appeal was dismissed due to adverse impact on the designated river valley and poor connectivity.	No change
Costessey settlement map	ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]	24410	Object	Unsound – Not legal The UK Climate Change Committee (CCC) has issued a standalone report providing recommended actions for local authorities, with a view to enabling the achievement of the 6th Carbon Budget and the 2050 net zero target. (https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/) The report includes a number of specific recommendations in respect of local planning policy, which they say should “lay the foundations towards net zero”. The CCC advises that Net Zero housing and commercial developments, connected to sustainable transport infrastructure, walking and cycling and public transport need to become the norm, not the exception”. Greenfield sites such as GNLP4045, GNLP0581 could potentially be contributing towards the urbanisation of the countryside. Changes to plan: In preparing the submission version of the plan, we urge you to address fully all of the above issues, to ensure that the plan complies with the applicable statutory and policy requirements.	The GNLP conforms to legislation and national planning policy and guidance, and, subject to the above, has had regard to climate change issues. Site GNLP4045 is not allocated in the plan, GNLP0581 located in the urban fringe is a contingency site. The Site Assessment booklet sets out the rationale for these sites.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
COS3/ GNLPSL2008 (Map)	Veolia ES (UK) Ltd (Belinder Gill) [19986]	24204	Support	<p>Page. 23 of the Site Allocation Focus Map currently shows site reference GNLPSL2008 as an Employment Allocation, as highlighted in blue. However, site reference GNLPSL2008 is not included with the 'Settlement Boundary' and the 'Redevelopment of Existing Uses within Settlement Boundary'. The boundary lines appear to stop at the halfway point of an existing employment site.</p> <p>The site has a long history of permitted employment uses. Therefore, it is considered that the remaining part of site referenced as GNLPSL2008 has been omitted from the Settlement Boundary in a drafting error, which should be corrected.</p> <p>Changes to plan: Extend the 'Settlement Boundary' line and the 'Redevelopment of Existing Uses within Settlement Boundary' line to include the whole of the operational site, reference GNLPSL2008, as already highlighted in blue on page. 23 of the Site Allocation Focus Map</p>	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan.	No change
COS5/ GNLP2074 (policy)	MR Peter Milliken [13706]	23328	Object	<p>Unsound – Legal</p> <p>The extra facilities of looking to add retail and leisure will add greatly to the over stretched local road network. The village of Easton will face major traffic issues in the gradual creep of development on this site. Two pubs/ restaurants as well as a hotel and a retail park are within less than 5 minutes walking distance from the Showground. This also creates conflict with the Easton Neighbourhood Plan Policy 2.</p> <p>Changes to plan: Removal of the adjusted wording from the original approval.</p>	The Plan as drafted is considered to be sound and therefore no modifications are considered necessary. The wording of the policy recognises the need to support the Showground's economic viability as a major visitor attraction and events location, and also helps meet the needs of local residents who live in the immediate area as well as future growth at Easton	No change
COS5/ GNLP2074 (policy)	Mr Mark Nicholas [19894]	23543	Object	<p>The policy is now somewhat contradictory in that clause 2 restricts any new buildings to supporting the main functions of the Showground, but the paragraph under clause 5 opens the door to retail and leisure uses. To remove this apparent inconsistency, re-drafted the policy by deleting clause 2 and replacing it with the words below clause 5.</p> <p>Changes to plan: Planning applications for the use of the identified area for leisure, tourism, recreation, arts and exhibition uses will be considered positively provided that:</p> <p>2. "Small scale Food retail, including an anchor unit selling a significant proportion of locally produced goods;</p>	The policy as drafted is considered to be sound and therefore no modifications are considered necessary.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p><i>café/restaurant/public house uses; and other leisure and service uses, to serve the wider function of the showground will also be considered”.</i></p> <p>Supporting text: 3.22 Recognising that the Norfolk Showground has a need to support its role as a major visitor attraction and events location, and that it is located within and supports the Food Enterprise Zone, it is proposed to alter the existing showground policies to permit small scale food, dining and leisure-led development that also helps meet the needs of local residents who live in the immediate area.</p>		

Cringleford (Including Employment Land at Keswick)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Cringleford Settlement Map 2	Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	24285	Object	Wishes to expand the employment allocation by adding another site Changes to plan: As noted above, the allocation of additional land at Keswick to the south of KES2 will support the plan in delivering on its employment objectives. The land identified as GNLP3047 should be included in the plan.	The plan as drafted is considered to be sound and as such no modifications are considered necessary. The plan identifies sufficient employment land so this site is not required for allocation as set out in the relevant site assessment booklet.	No change
Cringleford (3.24)	Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471],	24363, 24364, 24365, 23914, 24361	Object	Duty to Cooperate Dissatisfaction with increased housing numbers. Changes to plan: Soundness Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.	The plan as drafted is considered to be sound and as such no modifications are considered necessary. Evidence is provided in Site Assessment booklet regarding the appropriateness of this site. The uplift in the number of dwellings on the site has been agreed through discussions with officers at South Norfolk Council having regard to recent planning applications.	No change
GNLP0307/ GNLP0327 (policy)	Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	24182	Object	Unsound – Positively prepared - Justified On behalf of Barratt David Wilson The site Policy GNLP0307/GNLP0327 alone has the capacity to accommodate circa 500 new homes Changes to plan: para 1.62 In the absence of a justification for the uplift to be restricted to 410 new homes should be amended to substitute 'approximately' for ' at least ' and the following text should be added: ' <i>based on a design-led approach taking into account the characteristics of the sites and the densities of surrounding development.</i> ' and to allow for flexibility in the requirement for a vehicular route through the adjacent development site (reference:	The plan as drafted is considered to be sound and as such no modifications are considered necessary. Evidence is provided in Site Assessment booklet regarding the appropriateness of this site. The uplift in the number of dwellings on the site has been agreed through discussions with officers at South Norfolk Council having regard to recent planning applications and the identified constraints of the site.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				2013/1494) that is outside our client's control. Please see suggested alternative wording for the Policy below: "If achievable, the layout shall facilitate the future delivery of a vehicular route through the adjacent development site (reference: 2013/1494), capable of serving as a bus route;" 1.64 Finally, the Policy Map should delete the text <i>"within settlement boundary"</i> .		
GNLP0307/ GNLP0327 (policy)	Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]	24361	Object	Unsound - Duty to cooperate Changes to plan: Soundness Clear evidence of the need for the increase in number of dwellings over and above those approved in the Cringleford Neighbourhood Development Plan. Provision of this 'evidence of need' should aim at a dialogue between the authors of the GNLP and Cringleford Parish Council to establish a more appropriate level of development that fits with the local environment.	The plan as drafted is considered to be sound and as such no modifications are considered necessary. Evidence is provided in Site Assessment booklet regarding the appropriateness of this site. The uplift in the number of dwellings on the site has been agreed through discussions with officers at South Norfolk Council having regard to recent planning applications.	No change
KES2/0497, KES2 (policy)	Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	24556	object	Changes to plan: As noted above, the allocation of additional land at Keswick to the south of KES2 will support the plan in delivering on its employment objectives. The land identified as GNLP3047 should be included in the plan	The GNLP allocates sufficient employment land to meet identified needs so no changes are considered to be necessary.	No change
KES2/0497, KES2 (policy)	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23883	Support	We support the inclusion of points 6 and 8 to ensure that any potential impacts on our nearby Harford Bridge Marshes Reserve (and County Wildlife Site) are avoided.	Comment noted	No change
KES2/0497, KES2 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24023	Support	We welcome the changes made to include criterion 8 in relation to the grade II listed church and remains of the Church of All Saints.	Comment noted	No change
KES2/0497, KES2 (policy)	Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	24307	Support	Norwich Apex fully support this proposed policy allocation. The land presents the opportunity to provide additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing jobs growth in the Greater Norwich Area over the plan period. It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30,000 sq. meters of employment floorspace across the 'B' uses and potentially other employment generating uses. A development of this nature could deliver circa 1000 new jobs.	Comment noted	No change

Drayton

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Drayton Settlement Map	Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]	23682	Object	Unsound – Site GNLP0290 (unallocated) The draft plan states that an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as, inter alia, care homes. Policy amendments are suggested to policy 3 and 5 (see relevant section)	The Site Assessment booklet sets out the reasons for not allocating the site. No changes to the plan are considered to be necessary.	No change
DRA1 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24024	Support	HE welcomes the addition of the last two sentences of this policy that refer to the grade II listed 4 Manor Farm Close. We note the policy needs formatting with numbered bullets.	Comment noted. The policy is already formatted with numbered bullets so no change necessary	No change
DRA1 (policy)	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [12598]	24347	Object	Unsound – Unjustified - DTC Changes to plan: In order to ensure the GNLP is sound, Policy DRA1, its supporting text and accompanying maps should be amended to reflect our client's full planning application.	There is no guarantee that the planning application will come forward so the allocation seems appropriate.	No change

Easton and Honingham

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Easton & Honingham 3.39	MR Peter Milliken [13706]	23325	Object	Honingham is not to the South of Easton, that is the village of Marlingford. The statement is misleading, the village has a number of amenities including a pub and restaurant and a number of business large and small operating from premises within the village. It has a substantial village hall and a 3 star hotel. Changes to plan: The is section needs to be rewritten, with the correct information otherwise it gives a false impression of the village.	The GNLP – Part 2 Sites accurately depicts Honingham so no changes to the plan as written are considered to be necessary.	No change
Easton & Honingham 3.40	Easton Parish Council (Mr Francis Woodcock, Parish Clerk) [19782], MR Peter Milliken [13706]	23410, 23326	Object	Unsound – DTC Site EAS1 - The original housing numbers are not deliverable due to about 90 of these houses are allocated on land that is deemed contaminated by the department for environment food and rural affairs. Misleading to the inspector as to the deliverability 90 homes on an unallocated section of EAS1 next to the Easton Gym club on Bawburgh Road. Currently a planning application under South Norfolk 2021/0132 and is to be determined by Norfolk County Council FUL/2020/0110 Changes to plan: The removal of the extra housing allocation to the East of the Easton Gym. The separation	The plan as drafted is considered to be sound and as such no modifications are considered to be necessary. Evidence is provided in Site Assessment booklet regarding the appropriateness of this site. The uplift in the number of dwellings on the site has been agreed through discussions with officers at South Norfolk Council having regard to recent planning applications.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				of Easton and Honingham as two separate villages and full consideration of the Easton Neighbourhood Plan Policy 2 needs to be considered.		
EAS1 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24025	Support	Welcome criteria 8 and 9 and particularly the changes to 9 to make specific reference to St Peters Church.	Comment noted	No change

Hellesdon

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Hellesdon Settlement Map	Walsingham Planning (Mr Jake McLeod, Planning Consultant) [19963]	23910	Object	on behalf of Eversley Road Norwich Limited (hereafter referred to as ERNL) HEL5 – comprising on 67 dwellings has now nearly been build out but clients land has not been developed for housing - should be carried forward	The site has not been reallocated as it has planning permission and was considered close to completion.	No change
Hellesdon Settlement Map	CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]	24351	Object	Unsound On behalf of Jarrolds Site 2173 (not allocated for housing as previously requested). Changes to plan: a) In order to remedy the legal failings, the SA needs to be amended and reassess strategy and site allocation policies. b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment. c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required.	The Site assessment gives clear evidence of the reasons for not allocating this site so no changes to the plan are considered to be necessary.	No change
HEL1 (policy)	CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]	24348	Object	Unsound -Unjustified on behalf of Jarrolds there has been an inconsistent approach in Site Assessment and SA Report with regards to Site 2173 and HEL1 Changes to plan: a) In order to remedy the legal failings, the SA needs to be amended and reassess strategy and site allocation policies. b) The GNLP Site Assessment Booklets should be amended to follow and reference the SA assessment. c) These amendments will lead to amendments to the policies and supporting text contained in the GNLP. Consequently, further formal public consultation will be required	All the sites have been through a SA and Site Assessment process. The carried forward sites form part of the SA, Site Assessment and have been previously adopted by an inspector. The SA Reports references these sites.	No change
HEL1 (policy)	Historic England (Mrs Debbie Mack, Historic Environment	24026	Support	Welcome bullet point 4	Comments noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Planning Adviser) [19652]					
HEL1 (policy)	Bidwells (Mr Iain Hill, Partner) [16273]	24110	Object	Unsound – Unjustified Support Site HEL1 however, it can deliver additional dwellings to allocated such as 350 based on Policy 2 which states 25/ha. Changes to Plan Suggested amendments to Site Policy are included Items 1 (in relation to employment land) , 3 (highway), and 4 (historic environment) are provided.	The plan as written is considered to be sound and as such no amendments are necessary. This is a carried forward site from previous plan. Discussions to follow through SCG	No change
HEL4/ GNLP1019 (policy)	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24062	Object	Unsound on behalf of Drayton Farm Ltd - objects to the site been allocated for open space Changes to plan: The plan should be modified by deleting allocation GNLP1019 (open space Allocation). We also recommend that further consideration is given to the allocation of sites GNLP0332R and GNLP0334R for residential led development together with the extensive areas of recreational open space indicated in the landowner's Illustrative Framework submitted.	The plan as written is considered to be sound and therefore no modifications are considered to be necessary. This site has been carried forward for open space due to the need identified at Hellesdon. The site assessment process sets out the reasons for not allocating sites GNLP0332R and 0334R.. Mainly because this location would increase the urban sprawl of Hellesdon further into the open countryside with subsequent landscape impacts and distance to services and facilities. There are noise and safety concerns regarding proximity to the airport and the location of the site under the flight path. Significant highway improvements would also be necessary	No change

Rackheath

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Rackheath settlement map	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	23261	Object	planning permission has now been granted for 322 no. dwellings on land off Green Lane West, Rackheath (ref. 20171464; planning permission Changes to Plan: an appropriate note should be added to the Plan's supporting text (probably at paragraph 3.55) and an annotation to the Settlement Map. Without such an amendment, we contend that the Plan - insofar as it relates to Rackheath – is unsound	The plan as written is considered to be sound and as such no modifications are necessary. There is no guarantee that the planning application will come forward so the allocation seems appropriate.	No change
Rackheath settlement map	GP Planning Ltd (GP Planning Maureen Darrie, Director) [14933]	23829	Support	The Plan should be updated to reflect recent planning permissions	Comment noted	No change
Rackheath settlement map	Lanpro Services Ltd (Mr Ian Douglass, Head	24132	Object	On behalf of the Landowners at Land at Salhouse Road GNLP2166 should be allocated it's located approximately 920m south west of Rackheath Hall, whilst the boundary of a site allocated within the	The plan as written is considered to be sound therefore no modifications are required. The Site Assessment booklet sets out the constraints identified and the reasons for not allocating this	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	of Planning) [12984]			plan (GNLP0132) is located approximately 310m west of Rackheath Hall and would border the Hall's surrounding parkland. GNLP0132 proposes 1200 new homes, whereas GNLP2166 has the potential to accommodate 200 dwellings. It is considered that GNLP0132 has the potential to have a significant impact on the heritage asset, whilst GNLP2166 would have little, if any.	site. This site is considered to be unsuitable for allocation as it is located within land allocated as a landscape buffer to the Broadland Northway and close to Rackheath Hall and its historic gardens with likely landscape character and heritage impacts. Access to facilities is poor, Rackheath Primary school is located on the other side of the Broadland Northway with no safe walking route available	
Rackheath settlement map	Kevin Goodwin [19980]	24149	Support	Changes to plan: Fully support the non-designation of Sites GNLP4001 (promoted for 82) and GNLP0478 as housing sites.	Comment noted	No change
Rackheath settlement map	Sandra and Joe Hodges [20013]	24437	Object	Concerned about the amount of development taking place around Rackheath Hall grade II listed building and impacts to wildlife in the surrounding woodland and the area.	The plan as written is considered to be sound and as such no modifications are required. The Site Assessment process considers potential impacts together with comments from Historic England which have informed the site policy.	No change
Rackheath 3.55	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	23286	Object	Land off Green Lane West has been given planning permission for 322 dwellings. Therefore para 3.55 should be updated. Changes to plan: Site now been granted for 322 no. dwellings on land off Green Lane West, Rackheath (ref. 20171464; planning permission and site location plan attached). We suggest that – in the interests of completeness and to provide an accurate picture of housing provision here – an appropriate note should be added to the Plan's supporting text (probably at paragraph 3.55) and an annotation to the Settlement Map. Without such an amendment, we contend that the Plan - insofar as it relates to Rackheath – is unsound	The plan as written is considered to be sound and as such no modifications are required. There is no guarantee that the planning application will come forward so the allocation seems appropriate.	No change
Rackheath 3.55	GP Planning Ltd (GP Planning Maureen Darrie, Director) [14933]	23830	Object	Proposed site GNLP0478 should also be carried forward as an allocation. Changes to plan: Proposed site GNLP0478 should also be carried forward as an allocation.	The plan as written is considered to be sound and as such no modifications are required. The Site Assessment sets out the reasons for not allocating this site, the main issue being the inability to demonstrate suitable access.	No change
Existing Allocations to be carried forward (Rackheath) (3.60)	GP Planning Ltd (GP Planning Maureen Darrie, Director) [14933]	23775	Support	The GT 16 Allocation in the Growth Triangle Area Action Plan is supported, and planning applications are currently being prepared to see the site developed.	Comment noted	No change
GNLP0172 (policy)	Taylor Wimpey [19920]	23632	Support	Taylor Wimpey supports the decision to allocate land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172) for residential development, and requests that this allocation and the associated policy are retained in Draft GNLP unchanged.	Comment noted. The plan as written is considered to be sound and as such no modifications are required. The Site Assessment HELAA and SA are believed to be factually correct.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				In order to confirm that the decision to make the allocation at Policy GNLP0172 is robust and credible, it is suggested that some of the findings of the <u>site assessment</u> for this site in the HELAA and SA are <u>corrected</u> as set out in representations		
GNLP0172 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24027	Support	We welcome the changes to criterion 6 to make it absolutely clear that land to the west of the A1270 should only be used for open space and to conserve and where opportunities arise enhance the grade II listed Rackheath Hall and bridge.	Comment noted	No change

Sprowston

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Sprowston Settlement Map	Mr R Craggs [12893]	23476	Object	Unsound the SFRA's done to date are considered to be defective as Maps have not been followed through properly. With regards to the NEG, massive development have been approved within a massive flood plain that is close to sea level and where tidal effects are observable for miles.	The SFRA has been carried out by qualified professional consultants. The Environment Agency have been a partner on overseeing this work. The Plan as written is considered to be sound and as such no modifications are required.	No change
Sprowston Settlement Map	Mrs Nicole Wright [14312]	24389	Object	Unsound request that GNLP3024 be allocated for mix and community uses to complement nearby housing developments. Changes to plan: The allocation of small and medium-sized sites to provide services and amenities to support major housing allocations where these can be accessed by alternative modes to the private car. A key example is site GNLP3024 at Sprowston.	The plan as written is considered to be sound and as such no modifications are required. The Site Assessment sets out the reasons for not allocating this site. The main reason being more evidence about the need for the proposal and how the development will come forward	No change
Sprowston Settlement Map	La Ronde Wright (Mr David Jones, Senior Planner) [20006]	24426	Object	New Site promoted west of Blue Boar Lane and Salhouse Rd adjacent to Garden Centre.	This is a new site therefore it has not been subject to any site assessment, Sustainability Appraisal or consultation. It is also located within the OSRT Growth Triangle AAP which the GNLP is not superseding.	No change.
GNLP0132 (policy)	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23888	Object	Unsound - The proposed allocation is adjacent to a County Wildlife Site and includes ancient woodland within its boundary. In line with precautionary text already included for other allocations adjacent to important habitats in the plan, we recommend that additional policy requirements are set out to ensure that impacts to important habitats are avoided. Changes to plan: Both woodland sites will need protection from direct proximity to development, as well	The site allocation is considered to be sound and no modification is necessary as the protection of ancient woodland is adequately covered. ..	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				as provision of additional onsite green infrastructure in order to relieve disturbance pressure. The masterplan should also ensure that no built development is located within 100m of the ancient woodland, in line with recommendations made by the Woodland Trust (https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/) . The masterplan should also ensure that appropriate funds are secured for the long- term management of the ancient woodland to ensure that its wildlife value is safeguarded and any additional visitor pressure impacts from the new housing mitigated for.		
GNLP0132 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24028	Support	Although Rackheath Hall, grade II listed lies to the east of the site, the intervening vegetation should provide a suitable buffer. We welcome the reference to the historic parkland and need for protection of trees in bullet point 6.	Comment noted	No change
GNLP0132 (policy)	Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	24394	Object	<p>Unsound – Request flexibility on Affordable housing requirements as the infrastructure requirements (incl. GI) e.g. high school, landscape buffer, have resulted in reduction in housing numbers expected. In addition, Anglian Water have indicated that it may be necessary for the site to accommodate a Terminal Pumping Station, to enable the delivery of wider network improvements</p> <p>Changes to plan: Requirement to accommodate strategic infrastructure In the absence of any more generic wording in the Strategy Document, it is considered that the policy wording should make provision for future consideration of site-specific viability, and the ability to negotiate on matters such as affordable housing and CIL if necessary, if the site is required to provide/accommodate strategic infrastructure, which is required to facilitate the delivery of wider growth aspirations.</p>	The site policy as worded is considered to be sound and as such no modifications are necessary. All site policies must comply with the strategic policies in the GNLP.	No change

Taverham (including Ringland)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Taverham settlement map	Mr John Wilson [17114]	23255,	Support	Taverham Road residents support the plan as set presently, Support for not including GNLP 4040 nor major developments to the south side	Comment noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Taverham settlement map	Mrs Mary Bishop [17062]	23257	Support	Same as above 2325	Comment noted	No change
Taverham settlement map	Mr Peter Roe [17112]	23456	Support	Same as above 2325	Comment noted	No change
Taverham settlement map	Mr Stuart Smith [19873]	23457	Support	Support of the soundness of continuing to protect the Wensum Valley and rejection of any plans that encroach into it beyond previously agreed settlement boundaries. Pleased that the Wensum Valley's status as an SAC and also SSSI has been recognised	Comment noted	No change
Taverham settlement map	Robert and Alison Tickner [19936]	23695	Support	We fully support the decision to EXCLUDE sites GNLP 4040, 4039 and 2051 from the Local Plan	Comment noted	No change
Taverham settlement map	Mr Magnus Magnusson [14502]	24088	Object	Site GNLP4014 is available, achievable and deliverable (and viable) Changes to plan: Inclusion of site GNLP4014 within the GNLP as an allocation (residential and/or economic development)	The plan as written is considered to be sound and as such no modifications are required. The Site Assessment booklet sets out the reasons for not allocating this site. The Site Assessment concluded that the site submitted during the Regulation 18C consultation is not considered to be suitable for allocation as it is separate from the built up area and settlement boundary and therefore disconnected from services and facilities with no safe pedestrian access into Taverham.	No change
GNLP0159R (policy)	Bidwells (Mr Iain Hill, Partner) [16273]	24097	Object	Supports the site with some amendments. The Indicative Masterplan details how the site can be developed to provide 25 homes, with a revised 2 hectares whilst having regard to the identified site constraints. The increased area, which is the same ownership, would in the main be used to provide informal open space, as well as a link to the adjacent development in the form of a woodland walk, increasing the size of the wooded area being provided as part of the onsite open space. This would give a net density of 18.72 dwellings per hectare in accordance with Policy 2.	The plan as written is considered to be sound and as such no modifications are required. The Site Assessment booklet indicates that 12 can reasonably be expected to be achieved within the constraints of the site. If it is demonstrated through a detailed planning application that a higher number can appropriately be achieved, then permission could be given for that. The allocation policy would not prevent this as the figure of 12 in the policy is not a maximum. Therefore, no change to the policy is required.	No change
GNLP0337R (policy)	Taverham Parish Council (x Taverham Councillors x, x) [17789]	23470	Support	Agree GNLP 0337 is the preferred option for new residential development as it is in line with Policy TAV 1 in the Taverham Neighbourhood Plan, which states that larger scale residential development should be focused in the north-east of the Plan area close to the Broadland Northway. Supports that GNLP 0062 is an unreasonable site as it borders the River Wensum Green Corridor and the dismissal of GNLP 2051 and GNLP 2106 on highway and landscape grounds.	Comment noted	No change
GNLP0337R (policy)	NPS Property Consultants Ltd	23928	Object	Unsound – DTC -The policy should also include a new police station	The plan as written is considered to be sound, agent is in agreement that insufficient information	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	(Mr Andy Scales, Head of Planning Consultancy) [14146]			Changes to plan: The policy should be revised as follows (to add police station provision within its text) GNLP0337 6. <i>Land safeguarded for provision of police station</i>	provided at Reg. 18 did not permit the GN authorities to properly consider this proposal. Land safeguarded for local centre could potentially incorporate a police station and this could be addressed at the planning application stage.	
GNLP0337R (policy)	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24056, 24061, 24066	Object	Unsound – Legal - a) evidence should be produced to define, explain and allow proper testing of the anticipated delivery rates of all committed and allocated sites. b) Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. c) Additional small medium size contingency sites should be identified to provide greater assurance that additional allocations could be made and delivered quickly if housing delivery in the plan area fell short of expectation. d) Alternatively, other contingency sites should be identified to replace the Costessey contingency site referred to in Policy GNLP0581/2043.	The plan as written is considered to be sound and therefore no modifications are necessary to . Sufficient evidence is available to justify that a variety of allocations have been made to meet housing need with a significant delivery buffer.	No change
GNLP0337R (policy)	Bidwells (Mr Iain Hill, Partner) [16273]	24080	Object	Unsound – not justified - minor modifications suggested to landscape buffer description. Changes to Plan 78.36 ha 12. ' <i>Provision of significant an appropriate landscape buffer adjacent to A1270 and adequate noise mitigation measures to protect residential amenity</i> '.	The site area of 81.69 ha given in the policy includes the Marriott's way which technically does not form part of the site. therefore a minor modification to correct this factual error is considered acceptable.. With regard to the suggested wording change to policy requirement 12 to amend 'significant' to 'appropriate' landscape buffer the plan as worded is considered to be sound and therefore it is not necessary to make the change suggested. However, if the inspector is minded to amend the policy as suggested then the GN authorities have no objection to this. The buffer will depend on specific noise impacts which will be determined by a noise assessment submitted at the planning application stage.	Make a minor modification to correct factual error with the area of the site. Policy GNLP0337R should be amended to read: 'Land between Fir Covert Road and Reepham Road, Taverham (78.36ha) is allocated for residential development. The site area on the map accompanying the policy will also need to be amended. If the Inspector is minded to make a change to policy requirement 12 to replace the word 'significant' with 'an appropriate' landscape buffer as a Proposed Modification, then the GN

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
						authorities have no objection in principle to this
GNLP0337R (policy)	Lindy Platten-Jarvis [18674]	24424	Object	Legal Compliancy problems of high volumes of traffic speeding through the C roads of Felthorpe have been causing the residents, in particular in The Street, Church Lane and NR10 4DR Taverham Road, on inadequate for purpose roads, have been the subject of complaints from residents for the past 3 decades.	The plan as written is considered to be sound and as such no modifications are required. The Site Assessment process considers all the site constraints identified; including comments from highways and Development Management officers	No change

Thorpe St Andrew

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Thorpe St Andrew settlement map/	Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]	23680	Object	Changes to Plan: Amendment to the policy map to include Oasis Sport and Leisure Centre GNLP0540 within the settlement boundary. This is on the basis that planning permission for housing development (ref: 20151132 and 20190016) has been approved and the inclusion of this land outside of the settlement boundary will weaken the interpretation of draft policy 1 as it will not be clear what is built form of a settlement and where the countryside policies should apply.	The plan as written is considered to be sound and as such no modifications are required. Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan	No change
Thorpe St Andrew 3.75	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23373	Support	The following comment is factual. It is not a soundness issue, but it seems logical to address these comments as additional modifications. Factual update Thorpe St Andrews • Para 3.75 – last sentence, amend as follows ‘the Church of St Andrew and its ruins’ – as both the church and ruins are listed	The GN authorities accept that a minor modification could be made to the supporting text at paragraph 3.75 for clarity.	Make a minor modification to the final sentence of paragraph 3.75 to read: ‘, including the Grade II* Thorpe Hall and the Church of St Andrew and its ruins’

Trowse (including non-residential at Bixley and Whitlingham)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
TROW1 (policy)	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	23260	Object	Changes to plan: Update supporting text: “the second phase is pending completion of the S.106 agreement at the time of writing” (paragraph 3.83). In fact, planning permission has now been granted on Phase 2 and	The plan as written is sound and as such no modification is required. There is no guarantee that the planning application will come forward so the allocation seems appropriate.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				development lawfully commenced. We request that Policy TROW is updated accordingly		
TROW1 (policy)	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24029	Support	We welcome the changes made to this policy to include specific reference to the Trowse Conservation Area.	Comment noted	No change

Site Assessment Booklets (Norwich & Urban Fringe)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets	Mr Stuart Clancy [19872]	23455	Support	GNLP0062, GNLP0457. GNLP2051, GNLP2106 I seek assurances from the GNLP team that although the above sites are deemed based on the stage 1-7 assessment process "unreasonable sites". Could you confirm that they or any other sites within the Wensum Valley will be classified as suitable for development unclear any current planning process	Sites GNLP0062, GNLP0457. GNLP2051, GNLP2106 are not proposed for allocation within the GNLP	No change
Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets	GP Planning Ltd (GP Planning Maureen Darrie, Director) [14933]	23831	Object	Site reference GNLP0478 has not been allocated in the reg 19 draft plan. The representation contests that the reason not to allocate is based on highways constraints, to which a solution can be engineered and that the site should be allocated.	'The process of site selection is set out in the assessment booklet for the Rackheath which concludes that site GNLP0172 is the most suitable site for allocation in this parish. Site GNLP0478 was a reasonable alternative site, however it did not score well in the Sustainability Appraisal amongst other noted constraints. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.	No change
Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets	Colney Parish Council (Mrs H Martin, Clerk) [13644]	23843	Object	The land is allocated for "older people's accommodation" – the area identified is misleading as it contains historic parkland outside the development boundary. Only the Hall itself and a small area of land to the west of the drive would be available. This suggested area is outside the development boundary of the Parish. The Parish Committee wishes to protect this development boundary and will only support proposals which satisfy the agreed purposes of its Parish Plan.	Comments noted. The proposed site boundary contains area outside of the existing development boundary of the parish. Assessment of the site has been undertaken as detailed in the Colney site assessment booklet and it is considered to be suitable for allocation for the proposed specific use which benefits from this unique location.	No change
Site Assessment Booklets and Studies, Norwich and	Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]	24362	Object	Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford on the grounds of Soundness and Lack of Compliance with the Duty to Cooperate. The number of homes allocated does not respect the figure of 1,200 in the adopted	Comments noted References to the 'planning for the future' white paper refer to proposed legislation which is not enacted.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Urban Fringe Assessment Booklets				<p>Cringleford Neighbourhood Plan. The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford. Challenge that the plan meets the criteria of compliance with duty to cooperate (disregard of neighbourhood plan & parish council comments to previous consultations).</p> <p>The GNLP has not taken into consideration biodiversity or the changing economic environment when considering its proposals for our Parish. Housing development levels are not conducive to green space & biodiversity requirements.</p> <p>The GNLP has ignored Government, Local and its own most recent documents in formulating its proposals. Such as 'Building Better, Building Beautiful Commission which suggests exploration of building in vacant retail space & 'boxland', (particularly relevant due to diminishing high street retail exacerbated by pandemic) The evidence base states: "In line with changes in national planning policy, revisions to policy to move away from rigid quantitative retail unit thresholds and, instead, encourage a wider range of land uses in town centres." We believe the GNLP has not taken this point into consideration whatsoever when looking at developing greenfield sites for housing in Cringleford.</p> <p>There are no net gains in the proposals for Cringleford. This is with reference to proposals set out in the Government White Paper 'Planning for the Future'</p>		
Site Assessment Booklets and Studies, Norwich and Urban Fringe Assessment Booklets	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24534	Object	<p>Site assessments appear to be lacking. The assessments do not follow the 5 step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was recommended at reg 18 but has not been carried out.</p> <p>We continue to advise that these HIAs should be prepared; this is imperative to ensure a robust evidence base for the Local Plan. These should be prepared in advance of the EiP. This is a matter of priority, given the timetable for the Plan.</p>	Regard has been had to heritage issues as part of the site assessment process. Following advice from Historic England further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the developments in question. However it is recognised that these developments will need to be undertaken sensitively with regard to the heritage assets.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>Concerns regarding the indicative capacity of a number of sites. HE consider that Norwich's historic character is under pressure.. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. The evidence should set out the indicative site capacity, site area, density (as dwellings per hectare dph), assumed maximum height, surrounding heights of development, other on site and off site capacity considerations (e.g. heritage, natural environment etc.). This will provide a helpful starting point for us to be able to consider whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors).</p>		

Main Towns (chapters and site assessment booklets)

Aylsham (Including Blickling, Burgh & Tuttington and Oulton)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
4.1 4.2 4.3 4.4 4.5 Settlement Map 4.6 0311, 0595 and 2060 4.7 4.8 4.9 4.10 0596R 4.11 4.12	Julie and David Ashworth [19933] Mrs Lorna Ashworth [16609] Ms Wendy Bainham [19855] Miss Hannah Barker [19786] Mrs Sara Bell [19810] Joan Bennett [19845] Mr Trevor Bennett [14599] Jan Benson [19885] Ms Maggie Bewley [19797] Mr James Bullimore [19897] Margaret Callingham [19880] Sophie Callingham [19881] Ms Lesley Cannon [19840] Corinda Carnelley [19914] John Carnelley [19934] Gordon Clarke [19904] Ray Coles [19940]	23268 23301 23313 23324 23748 23289 23290 23594 23739 23616 23747 23752 23269 23302 23314 23378 23551 23595 23749 23240 23242 23270 23296 23300 23315 23340 23458 23478 23563 23599 23745 23466 23589 23590 23593 23597 23598 23670 23685 23686 23687 23690 23693 23694	Object	<p>The following is a summary of 65 representations. The majority of which it can be reasonably assumed are from residents of Aylsham. The points made contain a mixture of legal compliance and Duty to Cooperate objections, as well as objections to do with the soundness tests of 'positively prepared', 'justified', 'effective', and whether the plan is 'consistent with national policy. A common theme of the representations is that the consultation process between Regulation 18C and Regulation 19 was flawed, because of inclusion of a second site (GNLP0596R), without additional public consultation. Other objections concern the justification, evidence, and unsustainability of how the GNLP will impact Aylsham. Changes that have been made range from abandoning the plan, re-consulting, removing one or more site allocations, and making adjustments to policy to phase as early as possible the delivery a new primary school. The key points from 65 representations received include:</p> <ul style="list-style-type: none"> • There has been no consultation in respect of Reg. 19 where there are two sites 550 homes, an increase of 83% on the homes consulted upon in Reg. 18. • This plan for two sites and 500 homes should be withdrawn immediately. It is outrageous and illegal to make changes to the original plan without having consulted residents on this. The changes are not minor, in any way, and the plans are substantially different to those put before Aylsham residents as part of the consultation process. It is not legally compliant, and I am shocked that local government can assume it is above the law and push this through on unsuspecting residents who are more out of touch during a pandemic! • GNLP0596R to be removed from Regulation 19. • There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham. 	<p>The GNLP considers that consultation on the plan, including in relation to development in Aylsham, has been effective. Work on the GNLP began in 2016 with a 'call for sites', and information was in the public domain about land put forward for development. Including details of land promoted in Aylsham, which is now included for allocation in the GNLP.</p> <p>Public consultation, which included an exhibition in Aylsham Town Hall, was held in early 2018, and is referred to as 'Stage A'. Another Regulation 18 consultation was held in October 2018, and is referred to as 'Stage B'. Then, in January 2020 another substantial Regulation 18 consultation was held. This time on the Draft Strategy and Sites Plan, and is known as 'Stage C'. The 'Stage C' also included an exhibition for the public in Aylsham Town Hall.</p> <p>GNLP0596R which has since been added in Aylsham was consulted on as a "reasonable alternative" site at the Reg. 18C stage. GNLP0596R's status as a 'reasonable alternative', and that it was previously consulted upon, made it acceptable for inclusion at Regulation 19. It is further noted that the two allocated sites in Aylsham will provide a primary school, housing for the elderly and the potential for additional parking for the town as prioritised in the Neighbourhood Plan.</p> <p>As to concerns over infrastructure in Aylsham being unable to cope the GNLP disagrees. GNLP policies, and the planning system more generally, ensures development happens in a coordinated way with infrastructure improvements – like roads and utilities as they are required.</p> <p>A coordinated approach also happens between local planning and provision of services, such as healthcare. Healthcare commissioners have been kept informed on the GNLP's progress,</p>	<p>No substantive changes to plan required, but make the following minor modification to the first sentence of text at paragraph 4.2 to correct and clarify the market days in Aylsham. 'At the heart of the town is the Market Place that is well-known for its weekly Monday and Friday markets, and regular monthly Farmers' markets.</p>

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Mary Forrest-Hill [19913] Margaret Goose [19919] Mr & Mrs Gravenell [19917] Patricia Grocott [19938] Mr Paul Hancock [19900] Ms Lynda Hartley [19874] Jean Hawke [19935] Mrs Libby Henshaw [19812] Mr John Hill [15088] Anne Inderbitzin [19878] Dr Ksenija Ivir-Ashworth [15345] Tracy Jarman [19879] Mr Jon Jennings [19303] Mr Robert Kelly [19835] Mr James Layte [19889] Lindsay Little [19931] Mrs Sue Lovett [19813] Julie and Michael Mowbray [19970] Mrs Ann Minett [19890]	23697 23706 23711 23740 23754 23913 23920 23921 23922 23923 24133 24136 24137 24147 24190 24434 24436 24438 24510 23271 23294 23288 23357 23771 23773 23272 23295 23303 23308 23316 23397 23412 23480 23507 23516 23273 23304 23309 23317 23321 23512 23274 23305 23310 23513 23318 23275		<ul style="list-style-type: none"> The second site allocated for Aylsham, GNLP0596R, should be withdrawn and the GNLP board should undertake full consultation with residents and the Town Council to ensure they understand the issues within the town and its strengths. Withdraw the plan until consultation has been made. The plan is not positively prepared or justified in respect of allocating two sites and 550 homes without consideration of the infrastructure needs of the town, which are under strain from two recent developments of 550 new homes. To have one site under Reg.18 would have created problems, to have two sites magnifies the issue of infrastructure. There are problems of water supply and sewage disposal, the road network through the town will not cope with the extra traffic generated, the health and social care system and the education system will not cope with a population increase of 20%. Stick to just one site and provide the necessary town infrastructure. If both sites were to go ahead phased development should be considered (including a school in the first stage) so that the town and infrastructure has time to adjust. The area's needs have not been objectively assessed with regard to planning of the town in terms of extra traffic, lack of employment, schools, doctors, sewerage, pollution, environmental soundness. The presentation of the historic nature of the town and its community spirit which were mentioned rings hollow. It gives rise to the opposite in effect - the development of a dormitory for Norwich. I would like to comment on the soundness and legal compliance of the Greater Norwich Local Plan regarding housing developments in Aylsham. <p>1. The proposals are not legally compliant as regulation 18 states that Aylsham would have one site and regulation 19 states there will be two sites. This has never been consulted on.</p>	<p>and so know how development may change population trends, how the demand on services may change, and so can make commissioning and budgetary decisions accordingly.</p> <p>A specific concern is raised about available school places. To which it is important to be aware that Norfolk County Council, as the education authority, monitors the availability of school places relative to demand; and, has contributed to the development choices being made in the GNLP. Provision of a new school site gives opportunity, such as to move and expand, but there are no plans to close a school in Aylsham.</p> <p>Sewerage capacity for Aylsham is a long-standing concern but is addressed. Firstly Anglian Water have statutory obligations to their customers, and also Anglian Water have been thoroughly engaged as part of the GNLP process. Anglian Water have processes in place too with developers to ensure new homes and businesses are served. However, to emphasise the point, the GNLP recommends particularly in the case of Aylsham early engagement between the Environment Agency and Anglian Water.</p> <p>Another point made is on the accuracy of information about Aylsham. In particular to market days in Aylsham being Mondays and Fridays, as well as the farmer's market that is usually held on the first Saturday of the month. These points are noted, but do not relate to soundness and so could be dealt with as minor modifications.</p>	

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Mr Alan O'Rourke [19825] Deborah van Oosterom [19937] Mr David Owen [19804] Mr David Patience [19488] Mrs Teresa Patience [19827] Nicola Phillips [19877] Mr Malcolm Pim [19542] Mr Patrick Prekopp [19860] Mrs Angela Quinn [19537] Lynne Rush [19976] Fiona Scott [19978] Mrs Christine Schaitel [19888] Mrs Valerie Shaw [19824] Kelvin Sloper [20012] Mrs Karen Smith [19833] Mrs Maria Smyth [19807] Mr Steven Smyth [18354] Eileen Springall [19882] Margaret Summerhill [20011]	23306 23311 23319 23322 23514 23276 23307 23312 23320 23323 23334 23422 23459 23464 23467 23468 23469 23471 23472 23515 23596 23653 23713 23772 23392 23393 23324 23570 24435		<p>2. The proposals are not sound as regulation 19 failed to consider the impact of two sites on the infrastructure needs of the town including schools, health facilities, roads and utilities.</p> <ul style="list-style-type: none"> We attended the exhibition in Aylsham town hall where the plans for 300 new homes on one single site were on display. Officers were in attendance who were able to answer certain questions about the proposals, but could not say whether there would be a new doctors surgery to cope with perhaps another 1000 patients, nor adequate school provision. That was already bad enough, but now we are told that a further 550 homes could be built. This was never consulted on, neither with the public nor apparently with the town council. Can this be legal? 		

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	Geoffrey Sutton [19918] Mrs Catherine Thomas [19867] Mr Peter Tubby [19780] Mr R Tyler [20010] Mr Toby de Ville Shaw [19818] Mr Edward Welfare [19875] Mr Bob Wilson [19932] Mrs Charlotte Wootten [18596]					
4.1	Hevingham Parish Council [13686]	23283	Support	The Parish Council would ask that should these sites be granted, any works are staggered so traffic growth can be monitored along with the impact on services. Many of the residents of Hevingham use the doctors, dentists and schools in Aylsham and the Parish Council would not want to see those affected by an increase in numbers.	The comment is noted about how services in Aylsham affect residents in other villages. Healthcare commissioners have been kept informed on the GNLP's progress, and so know how development may change population trends, how the demand on services may change, and so can make commissioning and budgetary decisions accordingly.	No change
4.5	Burgh and Tuttington Parish Council [19386]	23585	Object	Because the risks to Aylsham and to our parish have not been adequately consulted on or assessed in sufficient detail, we would like to see the extra proposed housing allocation at site GNLP0596R removed from the plan. Without a properly co-ordinated and phased programme to upgrade the Aylsham sewerage plant, there will be an increased risk of raw sewage discharges into the River Bure upstream of Burgh-next-Aylsham. A House of Commons report in December 2020 (Briefing Paper Number 8820 - see attached file) detailed the frequency of raw sewage discharges across the country. In our region, it was stated that Anglian Water were responsible for over 10,000 raw sewage discharges in 2019 with a flow duration of 133,000 hours.	The GNLP Team disagrees about inadequate consultation and assessment, and that GNLP0596R should be removed. Whilst sewerage capacity for Aylsham is a long-standing concern it is addressed. Firstly Anglian Water have statutory obligations to their customers, and also Anglian Water have been thoroughly engaged as part of the GNLP process. Anglian Water have processes in place too with developers to ensure new homes and businesses are served. However, to emphasise the point, the GNLP recommends particularly in the case of Aylsham early engagement between the Environment Agency and Anglian Water.	No change
Settlement Map	Colby & Banningham Parish Council [12580]	23913	Object	The first site, on Burgh Road of 300 homes, included provision for a primary school. The second site, on Norwich Road, was added without warning or consultation with the town; this is unreasonable and	Our view is community involvement has taken place. GNLP0596R which has since been added in Aylsham was consulted on as a "reasonable alternative" site at the Reg. 18C stage. GNLP0596R's status as a 'reasonable	No change

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				<p>represents an increase of 83% -- a failure to consult on a significant change.</p> <p>Infrastructure issues have not been addressed, in particular water/sewerage, plus parking in the town to cope with the increased demand on primary care, dentists, shops and supermarkets. Schools are at capacity now – the new primary school proposed as part of the first development would probably be built after completion, There would also be increased pressure on secondary and early years provision – there is no mention of this in the plan.</p> <p>Planning and community involvement has not been met as detailed in the National Planning Policy Framework, neither has the duty of co-operation to engage with various stakeholders during the preparation of the plan. The proposed 325 houses at Badersfield would also impact on Aylsham.</p>	<p>alternative’, and that it was previously consulted upon, made it acceptable for inclusion at Regulation 19. It is further noted that the two allocated sites in Aylsham will provide a primary school, housing for the elderly and the potential for additional parking for the town as prioritised in the Neighbourhood Plan.</p> <p>As to concerns over infrastructure in Aylsham being unable to cope the GNLP disagrees. GNLP policies, and the planning system more generally, ensures development happens in a coordinated way with infrastructure improvements – like roads and utilities as they are required. Also, there can be some positives to development, such as more potential customers to support local businesses. This is true of early years education, which is often provided by private nursery businesses.</p> <p>On the subject of education, it is important to be aware that Norfolk County Council, as the education authority, monitors the availability of school places relative to demand; and, has contributed to the development choices being made in the GNLP. Provision of a new school site provides opportunity, such as to move and expand, but there are no plans to close a school in Aylsham.</p> <p>Whilst sewerage capacity for Aylsham is a long-standing infrastructure concern it is addressed. Firstly Anglian Water have statutory obligations to their customers, and also Anglian Water have been thoroughly engaged as part of the GNLP process. Anglian Water have processes in place too with developers to ensure new homes and businesses are served. However, to emphasise the point, the GNLP recommends particularly in the case of Aylsham early engagement between the Environment Agency and Anglian Water.</p> <p>At the time of writing, the proposals for 325 homes at Badersfield have not reached the planning application stage and is not in the local plan for North Norfolk District Council. So it is</p>	

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					not possible to determine if or what impact this would have on Aylsham.	
Settlement Map	Armstrong Rigg Planning [15285]	24086	Object	<p>Further review of the plan is needed to take account of updated information about our client's site at north east Aylsham (GNLP0336).</p> <p>There are errors in the site assessment process and a proposal submitted to officers concerning the delivery of a 150-dwelling scheme on our client's site has been omitted from consideration as a reasonable alternative.</p> <p>In respect of soundness the consequences of the flaws in the site assessment process, further expanded on in our response, render the plan unsound on the basis that it is not justified, effective or consistent with national policy.</p>	The issues raised here are addressed by the site assessment work, and GNLP0336 is considered unsuitable for inclusion. The advantages of GNLP0596R being in its access and proximity to the centre of Aylsham when compared to GNLP0336. Neither was GNLP0336 split into two different sites of 150 and 300 units. As to do so would be to artificially split one site into two phases when it appears inevitable that the promoters would seek a full development of 300 homes at a later date.	No change
Settlement Map	Cllr Steve Riley [20017]	24510	Object	<p>An important strategy of the document and central government policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by putting forward two sites for development on the edge of the town where the residents will be dependent upon cars.</p> <p>There has been no consultation with Aylsham Town Council or the residents on the changes regarding the content of the sites section of Regulation 19. There are two sites in Regulation 19 totalling 550 homes, an increase of 83% on the homes consulted upon in Regulation 18. Infrastructure could not be consulted upon and therefore examined to see if this could support a second site.</p> <p>If the second site is not removed at this stage, then to ensure that this is legally sound and properly prepared, then this should be consulted on as per reg 18 stage again. To be made legally sound, compliant and properly prepared the second site should be removed or that phasing takes place to ensure infrastructure keeps pace.</p>	<p>Dealing with climate change is of the utmost importance, and the GNLP recognises this. But the challenge to provide for the economy and housing cannot be ignored either. The overall housing numbers are set to ensure that the housing need for Greater Norwich identified by using the government's methodology will be met, including a buffer to ensure delivery.</p> <p>As to Aylsham, sites have undergone a site assessment process and have been considered as part of a Sustainability Appraisal. This work ensures adverse impacts are being avoided; or, if unavoidable are being mitigated by provisions in strategic policies or site specific requirements for the development.</p> <p>It is the GNLP Team's view that community involvement has taken place. GNLP0596R which has since been added in Aylsham was consulted on as a "reasonable alternative" site at the Reg. 18C stage. GNLP0596R's status as a 'reasonable alternative', and that it was previously consulted upon, made it acceptable for inclusion at Regulation 19. It is further noted that the two allocated sites in Aylsham will provide a primary school, housing for the elderly and the potential for additional parking for the town as prioritised in the Neighbourhood Plan.</p>	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
0311 0595 2060	Bidwells [12857]	24371	Object	On behalf of Hopkins Homes, we continue to strongly support the proposed allocation of GNLP0311, GNLP0595 and GNLP2060, Land South of Burgh Road and West of A140, Aylsham. Within the representation is a concept masterplan, and only minor modifications are required to the drafted policy. A wording change is sought to clarify that the developers are required to provide land for a new primary school, and not the school. In relation to highways requirements, a carriageway width along the frontage of 5.5m rather than 6m is sought.	<p>The support for the allocation is welcomed and gives confidence of the deliverability of GNLP0311, 0595 and 2060.</p> <p>It is noted that minor modifications are sought but the GN authorities are of the view that the policy as drafted is sound and therefore these are not necessary.</p> <p>On the point about the school requirement, it is agreed that it pertains only to land and not paying for the school, but the GN authorities believe that the policy as drafted is suitably clear and no change is needed.</p> <p>As to the point about providing a 5.5m rather than 6.0m wide carriageway at the site frontage – the 6.0m requirement is thought achievable, but if it is not and if the Highways Authority is content, this could be reviewed at the planning application stage.</p>	No change
0596R	GP Planning Ltd [14933]	23666	Object	Key issues of land use planning are of concern to the occupiers of Diggens Farmhouse. There are concerns surrounding surface water management and ability to provide a surface water drainage solution that does not impact on the farmhouse, its surrounds, the existing well and ground water level. General development layout, height, style and other impacts that may affect the farmhouse or its immediate surrounds.	The GNLP0596R policy as drafted is considered to be sound. In dealing with risk of flooding and drainage, criterion 7 requires assessment to ensure there is sewer capacity and no increased flood risk downstream. Furthermore, and with particular reference to the Grade II Diggens Farmhouse, criterion 8 addresses conserving and enhancing its setting.	No change
4.1 4.5 0311 0595 2060 0596R	Aylsham Town Council [13265]	23756 23340 23758 23760 23761	Object	<p>There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham. If simple information such as this is incorrect how can the rest of the plan be trusted?</p> <p>The process of community involvement for the plan should be in general accordance with the LPA's Statement of Community Involvement [SCI]. In regard to Aylsham no virtual engagement methods have been used to "to engage with community and stakeholder bodies" in the town.</p> <p>In regard to Aylsham, the Town Council were not approached and there is no evidence that "a wide section of the community has been proactively engaged".</p>	The GNLP Team is of the view that the assessment work done for Aylsham is sound, and that factual inaccuracies such as to do with market days, can be dealt with as minor modifications. It is also considered that community involvement has taken place. GNLP0596R which has since been added in Aylsham was consulted on as a "reasonable alternative" site at the Reg. 18C stage. GNLP0596R's status as a 'reasonable alternative', and that it was previously consulted upon, made it acceptable for inclusion at Regulation 19. It is further noted that the two allocated sites in Aylsham will provide a primary school, housing for the elderly and the potential for additional parking for the town as prioritised in the Neighbourhood Plan.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>In regard to Aylsham, Broadland has not engaged constructively or otherwise with Aylsham Town Council, nor with North Norfolk District Council in respect of the Badersfield development near Aylsham. We ask that Broadland provide evidence of how they have complied with this duty.</p> <p>There has been no consultation with Aylsham Town Council or the residents on the changes regarding the content of the sites section of Regulation 19. There are two sites in Regulation 19 with 550 homes, an increase of 83% on the homes consulted upon in Regulation 18.</p> <p>The GNLP suggested that the feedback for Reg 18 gave 'confidence to the deliverability of new residential development in Aylsham'. The only supportive responses came from the developers. Therefore, the understanding of the response is inadequate and therefore both not legally compliant and unsound.</p> <p>In relation to GNLP0311/0595/2060, the road network through the town will not cope with the extra traffic generated by the new school and the increased population. The developers of this site and the GNLP have put in some mitigating factors in the immediate vicinity of the sites but ignored the fact that the road from the town to the site is already busy and in places needs to be single tracked and cannot be widened to accommodate additional traffic.</p>	<p>At the time of writing, the proposals for 325 homes at Badersfield have not reached the planning application stage, and are not in the local plan for North Norfolk District Council. So it is not possible to determine if or what impact this would have on Aylsham. More generally though, the Duty to Cooperate between the Greater Norwich authorities and North Norfolk District Council has been met, and is documented in the Norfolk Strategic Planning Framework (June 2019).</p>	
0311 0595 2060 0596R	Anglian Water Services Ltd [12528]	23840 23844	Object	<p>Soundness objection raised to policy GNLP0311/0595/2060 as there are existing foul and surface water sewers within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of new text to clarify the situation and ensure the safeguarding of suitable access for the maintenance of water supply, foul and surface water drainage infrastructure.</p> <p>Soundness objection raised to policy GNLP0596R as there is an existing foul sewer within the site boundary which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the additional of new policy</p>	<p>No changes are required for soundness, however the GNLP authorities accept that minor modifications could be made to both policies for clarity.</p>	<p>In the case of Policy GNLP0311, 0595 and 2060 make the following minor modification to add additional wording to the supporting text at the end of paragraph 4.6 for clarity: 'There are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site. These should be taken onto account in the design of development including safeguarding</p>

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>criterion to read: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'</p>		<p>suitable access for maintenance'.</p> <p>In the case of Policy GNLP0596R make the following minor modification to add additional wording to the supporting text at the end of paragraph 4.8 for clarity: 'There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance'.</p>
0311 0595 2060	Historic England [19652]	24030 24031	1 Object 1 Support	<p>In relation to GNLP0596R, Diggens Farmhouse, which is a listed as grade II, lies to the east of the site. We welcome criterion 8 that specifically references the asset but suggest that mention should also be made of the need to include open space and landscaping at the eastern end of the site to protect the significance of the asset. We suggest a detailed HIA is undertaken for this site prior to EiP to assess the suitability or otherwise of the site and consider any appropriate mitigation.</p> <p>In relation to GNLP0311/0595/2060, we welcome the change at bullet point 8 to specifically reference Bure Valley Farmhouse.</p>	The comment is noted and further heritage assessment work is being undertaken in relation to GNLP0596R and the neighbouring Diggens Farmhouse.	No change
4.8 4.9 0596R	Cornerstone Planning Ltd [13498]	24142 24143 24144	1 Object 1 Support	<p>Norfolk Homes Ltd confirms that 0.25 hectares of the site will be provided for community use to meet sustainable transport objectives, as set out in the Aylsham Neighbourhood Plan.</p> <p>It should be noted that whilst Norfolk Homes have indicated - through the submitted masterplan for the site - that there would be two points of vehicular/pedestrian access to Norwich Road, and a footpath/cycleway/emergency access to Buxton Road, there is no means or intention to access Copeman Road. The latter would require third party land, over which Norfolk Homes has no control. It is therefore</p>	The comment is noted and gives confidence of the deliverability of GNLP0596R. The point regarding the inaccessibility of Copeman Road for footpath/cycleway/emergency access is noted and it would appear that this has been added to the policy in error and should therefore be deleted. As this is an error the GN authorities would suggest that this can be done as a minor modification	Make a minor modification to policy requirement 4 to remove the reference to Copeman Road which has been included in error. Amend the text to read: Pedestrian and cycle access only from Buxton Road. Safeguarding of existing Public Right of Way at south of site.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				recommended that reference to Copeman Road be deleted.		
0596R	Buxton with Lamas Parish Council [12592]	24145	Object	<p>The PC (Buxton with Lamas) does not believe that the second additional site for Aylsham should have been added within regulation 19 without full consultation and that if they were to get permission the infrastructure would not cope.</p> <p>That phasing of two sites to aid any identified infrastructure problems which may have been identified via consultation could not be considered as the second site was not consulted on in reg 18, therefore, is not legally sound or properly prepared.</p> <p>Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate] requires Broadland to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. Buxton with Lamas parish council were not consulted on with regard to the second site as this was not put forward in reg 18 and therefore is not sound or legally compliant or properly prepared.</p>	The view of the Greater Norwich authorities is that consultation has taken place and that the demands on infrastructure can be dealt with. GNLP0596R which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage. GNLP0596R’s status as a ‘reasonable alternative’, and that it was previously consulted upon, made it acceptable for inclusion at Regulation 19. It is further noted that the two allocated sites in Aylsham will provide a primary school, housing for the elderly and the potential for additional parking for the town as prioritised in the Neighbourhood Plan.	No change

Diss (Including part of Roydon)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	William Gallagher [19988]	24240 24241	Object	<p>The discrepancy between the GNLP and Diss Neighbourhood Plan allocations must be corrected prior to the GNLP being submitted for examination. This would be addressed by DIS3 being explicitly referenced as an existing allocated site that contributes to the committed housing supply for the purposes of the emerging GNLP and that it is only sites for the additional 250 homes that the Neighbourhood Plan is required to allocate.</p> <p>If these changes are not made, then the approach to site allocations for Diss would fail the tests of being justified and effective. This is because DIS1 and DIS3 are currently counted towards the housing supply figure, and therefore the deliverability of the plan, but would be inadvertently deallocated resulting in the minimum identified level of development for Diss being less than that set out in Part 1 of the GNLP.</p>	The delivery of existing allocations DIS1 and DIS3 appears likely and their inclusion in commitment at the present time is thought reasonable. Therefore, this is not a matter that affects the overall soundness of the GNLP. Alternatively, should DIS1 or DIS3 be delayed, then any updating or carrying forward of policy can be undertaken by the Diss and District Neighbourhood Plan, this being appropriate given the ambition to devolve plan-making to the community level where possible.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Strutt & Parker [17169]	24316	Object	We consider that the land East of Shelfanger Road and West of Heywood Road, Diss (GNLP0250/0342/0291) should be reinstated as an allocation within the Plan. It is considered that the failure of the Plan to allocate sites in Diss, and the decision to follow an amended strategy to devolve new allocations to meet the majority of the strategic new housing requirement to the Neighbourhood Plan, cannot be considered sound. This strategy is not consistent with Policy 1, Policy 7 or Policy 7.2 of the Plan which do not make any reference to such an approach, nor do they make any contingency in the event that such deferred allocations are not forthcoming. This is not an approach being followed for other Designated Neighbourhood Plan Areas and there is no justification for the decision for site GNLP0102 to remain as an allocation within the Plan, to the exclusion of GNLP0250/0342/0291. This is particularly given site GNLP0102 has not been demonstrated to be deliverable, is not supported at the local level and could come forward irrespective of a receiving an allocation with the Plan, or Neighbourhood Plan.	The choice to devolve the majority of site allocations to the Diss and District Neighbourhood Plan is considered to be sound. The neighbourhood plan is making good progress and there is a clear intention to allocate to the strategic requirement of 400 new homes. By contrast, the different approach of allocating GNLP0102 is also considered sound due to its brownfield status and proximity to the railway station.	No change
0102	Norfolk Wildlife Trust [17875]	23889	Object	As the allocation will lead to additional visitor pressure on the CWS, we strongly recommend that the need to assess and provide mitigation for these impacts is added to the policy text, in line with similar approaches made in other allocations with potential impacts on nearby CWSs.	The GNLP Team considers the policy for GNLP0102 as drafted to be sound. Especially as 'Policy 3 – Environmental Protection' sets out clear expectations. These include that development proposals should conserve and enhance the natural environment, avoid harm to designated and non-designated assets, deliver biodiversity net gain, contribute to the Recreational Impact Avoidance and Mitigation Strategy, and provide accessible natural greenspace of at least two hectares per 1,000 population. However, if the Inspector is minded to make a change to insert an additional policy requirement relating to the nearby County Wildlife Site as a Proposed Modification then the GN authorities have no objection to this.	No change If the Inspector is minded to make a change to insert an additional policy requirement to read 'Undertake an ecological assessment and provide mitigation for any adverse impacts on the nearby County Wildlife Site' as a Proposed Modification then the GN authorities have no objection in principle to this.
0102	Diss Town Council [14137]	24090	Object	As you know, it was our intention to allocate this site in the Diss and District Neighbourhood Plan as part of the DDNP's aim to meet fully the indicative housing requirement of 400. Although we feel that Planning Practice Guidance supports its inclusion in the DDNP, we have accepted the GNDP explanation that the GNLP needs to include the allocation by virtue of it being brownfield land and adjacent to the railway	Although the GNLP Team considers that the policy as drafted is sound, the view of the Town Council is understood, and achieving an additional footway northwards from GNLP0102 to Frenze Hall Lane would be desirable. Discussions are ongoing as to whether a footway/cycleway solution can be found, and this includes the promoter of GNLP0102. If a	No change If a footway/cycleway solution can be found to link northwards from the site to Frenze Hall Lane then the GN authorities have no objection in principle if the

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				station. Diss Town Council is, however, concerned that there is no provision for the necessary footway although it was included in your first draft policy issued in December 2019 but not in the later document dated January 2021. The connection of these footways is essential for the safety of pedestrians going to the town centre or taking children to schools as all alternative routes are much further. The town council's support for this site has always been and remains contingent on the provision of a footway connecting the frontage of the Frontier site to Frenze Hall Lane.	satisfactory, Implementable solution can be identified, the GN authorities have no objection to the Inspector including a Proposed Modification to the policy..	Inspector is minded to make a Proposed Modification to this effect.
0102	Savills (UK) Ltd [19686]	24129	Support	The Site is proposed to be allocated for residential development in the emerging GNLP, under Site Specific Policy GNLP0102 ('the Policy'). This identifies the site as being suitable for approximately 150 homes. Our client fully supports the inclusion of the Site within the GNLP and the principle of its allocation for residential redevelopment. The redevelopment of the Site can help to meet strategic objectives in terms of the overall provision of new dwellings within the GNLP area as set out in Policy 1 (The Sustainable Growth Strategy) and Policy 7.2 (The Main Towns). It also reflects its sustainable location, accessibility and deliverability within the emerging Plan period.	The comment is noted.	No change
0102	Pigeon Investment Management Ltd [13863]	24265 24277	Object	We are pleased to submit representations for Pigeon Investment Management Ltd and the landowners in support of Land at Nelson Road, Diss. Please find attached response forms, the representations, a Concept Plan and Landownership Plan. We are pleased to submit representations for Pigeon Investment Management Ltd and the landowners in support of Land at Walcot Green Lane, Diss. Please find attached response forms, the representations and a Delivery Statement.	The issues raised here are addressed by the site assessment work, and sites continues GLNP1044 and GLNP1045 to be considered unsuitable for inclusion. An approach that was also partly taken to give prominence to the importance of neighbourhood planning. However, for GNLP1044 further constraints to do with highways and landscape were noted at the Regulation 18C stage, irrespective of the decision to partially devolve site allocations to the neighbourhood plan.	No change
0102	AAH Planning Consultants [19998]	24311	Object	Objects to the overall housing strategy of 1,961 per year with an over-allocation of 22%. It would represent both a vulnerable overall strategy and would therefore be expressly contrary to the requirement to significantly boost the supply of housing embedded within the Framework. It would also lead to insufficient flexibility in the number of housing allocations to ensure that a five-year housing land supply can be maintained over the plan period to meet the housing requirement. Given the status of Diss and the Towns access to services, it is	The issues raised here are addressed by the site assessment work, and GNLP0599 is considered unsuitable for inclusion. An approach that was also partly taken to give prominence to the importance of neighbourhood planning. The growth strategy is considered appropriate, both in terms of housing numbers and the distribution of development to be met from sites	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				therefore difficult to comprehend the new allocation of only 150 dwellings in the GNLP with the future allocation of 250 dwellings in the Diss and District Area Neighbourhood Plan. The representation also advocates for a site Land North of Walcot Rise Diss Norfolk, which is a current outline planning application (2019/1555) for up to 90 dwellings.	<p>in Diss. This includes a scale of growth to meet the City Deal. As paragraph 185 says. "Our overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal."</p> <p>Diss has many advantages, but there are particular vehicular pressures on the A1066 Victoria Road and B1077 Denmark Street. Hence why the strategic requirement for new homes was set at 400. The approach being one that enables sustainable growth to support the town's economy, and gives opportunity to people to more frequently use the train and bus services.</p>	

Redenhall with Harleston

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Sequence (UK) Ltd [19983]	24176	Object	Sequence consider that the Settlement Boundary for the Redenhall with Harleston Policy Map should be redrawn to include draft allocations GNLP2108 and GNLP2136 to provide a robust and defensible boundary to the A143 that will endure over the plan period as well as a more coherent connection to the Settlement Boundary to the west of GNLP2108. These suggested revisions are shown on the enclosed drawing reference 2021.02.12.Settlement_Boundary_Option1.	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan.	No change
2108 2136 HAR 4 HAR 5 HAR 6	Anglian Water Services [12528]	23847 23848 23849 23850 23851	Object	<p>Soundness objection raised to policies GNLP2108, 2136, HAR4, HAR5 and HAR6 as there is existing Anglian Water infrastructure within the boundaries of the sites which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of new text/policy criterion to clarify the situation as follows:</p> <p>Add new policy criterion and paragraph of supporting text to Site Policy GNLP2108 in relation to existing water mains and surface water sewer including safeguarding suitable access for maintenance.</p>	No changes are required for soundness, however the GNLP authorities accept that minor modifications could be made to the policies for clarity.	In the case of Policy GNLP2108 make the following minor modification to add additional wording to the supporting text at the end of paragraph 4.33 for clarity: 'There is an existing water mains and surface water sewer in Anglian Water's ownership within the boundary of the site. This should be taken

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>Add new policy criterion and paragraph of supporting text to Policy GNLP2136 in relation to existing water main including safeguarding suitable access for maintenance.</p> <p>Add new policy criterion and paragraph of supporting text to Policy HAR 4 in relation to existing water main and foul sewer including safeguarding suitable access for maintenance.'</p> <p>Add new policy criterion and paragraph of supporting text to Policy HAR 5 in relation to existing foul sewer including safeguarding suitable access for maintenance</p> <p>Add new policy criterion and paragraph of supporting text to Policy HAR 6 in relation to existing water main and foul and surface water sewers including safeguarding suitable access for maintenance.</p>		<p>into account in the design of development including safeguarding suitable access for maintenance'.</p> <p>In the case of Policy GNLP2136 make the following minor modification to add additional wording to the supporting text at the end of the first sentence of paragraph 4.35 for clarity: 'There is an existing water main in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance'.</p> <p>In the case of Policy HAR4 make the following minor modification to add additional wording to the supporting text at the end of paragraph 4.35 for clarity: 'There is an existing water main and foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance'.</p>

Policy/ Map/ Para No. Etc	Respondent/ Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
						<p>In the case of Policy HAR5 make the following minor modification to add additional wording to the supporting text at the end of paragraph 4.37 for clarity: 'There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance'.</p> <p>In the case of Policy HAR6 make the following minor modification to add additional wording to the supporting text at the end of paragraph 4.38 for clarity: 'There is an existing water main and foul and surface water sewers in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance'.</p>
2108	Historic England [19652]	24032 24535	Support	Policy GNLP2108 Land south of Spirketts Lane We welcome the changes to criterion 4 to reference the listed buildings	The comment is noted.	No change
2136	Policy Strutt & Parker [17169]	24315	Support	Paragraph 72 of the NPPF indicates that the supply of a large number of new homes can often be best achieved through planning for large scale development	The drafting of policy GNLP2136 continues to be sound, and this representation helps evidence the deliverability of the allocation.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				such as extensions to existing towns. The allocation of Site GNLP2136 is clearly compatible with these objectives. The Site is deliverable and extensive work has already been undertaken along with community engagement to ensure that it can contribute to the District's housing supply, delivering sustainable development in the early part of the Plan period. Accordingly, Scott Properties strongly supports the inclusion of the Site as an allocation in the Plan.		

Hethel (Strategic Employment Area)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Neil Dyer [19941]	23712	Object	Suggested revision to settlement boundary at the earliest available opportunity should follow the ditch line of the Hethel woodland to include existing Classic Team Lotus building built in 2017, existing Turing Park Industrial Estate, planning granted in 2011 and built in 2017 (GNLP2097) and Turing Park Phase 2 (GNLP2109).	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan.	No change
Settlement Map	Bidwells [12857]	24295 24296 24297	Object	Its specific Settlement Boundary is not sound. Since 2015 the parcel of land has been subject to a planning application (LPA Ref. 2015/2172/F) for a 'New race shop to house Classic Team Lotus' that received planning permission on 18/1/16, as subsequently amended (2016/1749) that received planning permission on 29/9/16.	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan.	No change
2109	Goff Petroleum [19959]	23825	Object	We support the allocation of the land South of Hethel Industrial Estate but consider that land at Stanfield Road, Wymondham (GNLP0116) should also be allocated. Our previous representations submitted at Regulation 18C stage still stand.	The GNLP continues to hold the view that this site is unreasonable for allocation. Nevertheless, this need not preclude redevelopment. The previous site assessment remains relevant and said. "This site is owned by Goff Petroleum who are seeking to diversify their existing operations on the adjacent land. Development of this site has good prospects to come forward given that the end-user is already known. There are clear commercial	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					advantages to expanding on the current site rather than relocating. Uses involved on the site require consultation with the Health & Safety Executive, and it is unlikely that an alternative suitable site is readily available. Positive discussions have been held with the Development Management team and continued progression of a planning application is encouraged, and so the site not to be allocated.”	
2109	Norfolk Wildlife Trust [17875]	23890 23892 23893	Object	Given the proximity of the existing industrial area to the wood, and the sensitivity of ancient woodland to nearby development, we recommend that any allocations in this area include additional policy text specifically requiring the any applications to specifically address potential impacts on the CWS and ancient woodland from impacts including encroachment and light pollution. This area is also a key location for connectivity with other priority habitats in the south Norfolk claylands and net gain contributions could help link Hethel Wood with other nearby County Wildlife Sites and ancient woodland, improving their ecological value.	Criterion 6 of Policy 2109 is deliberately worded as an ‘Ecological Impact Assessment is required.’ This is so that all ecological considerations are included and not just the most obvious ones, like the nearby County Wildlife Site. So whilst the GNLP considers the policy to be sound, the possibility of modifications to assist clarification are not ruled out if the Inspector considers these to be appropriate. If highlighting particular issues would be helpful, like encroachment on the CWS, light pollution, and the wider South Norfolk claylands habitat then the GN authorities have no objection to this.	No change If the Inspector is minded to make a change to policy criterion 6 to highlight particular issues such as encroachment on the CWS, light pollution and the wider South Norfolk claylands habitat as a Proposed Modification, then the GN authorities have no objection in principle to this.
2109	Historic England [19652]	24033 24034	Object	Whilst we welcome the reference to the grade II listed building at criterion 4, the policy needs to say that there is a need to conserve and where appropriate enhance the significance of the heritage asset including any contribution made to that significance by setting. It is more than just protecting residential amenity. We continue to suggest a detailed HIA is undertaken for this site to assess the suitability or otherwise of the site and consider any appropriate mitigation.	Policy GNLP2109 as worded is considered to be sound and therefore it is not necessary to make the change suggested, however if the Inspector is minded to make a change to policy criterion 4 to refer to the importance of enhancing nearby heritage assets and their setting as a Proposed Modification then the GN authorities have no objection to this. Further heritage assessment work has been undertaken in relation to GNLP2109 as suggested by Historic England.	No change If the Inspector is minded to make a change to insert text into policy criterion 4 to read: ‘Layout and design to must protect the residential amenity and conserve and enhance the significance of nearby Grade II Little Potash (Brunel House), including any contribution made to that significance by setting ’ as a Proposed Modification, then the GN authorities have no objection in principle to this.

Long Stratton (Including Parts of Tharston and Hapton Parish)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24162	Object	<p>Objects on the basis that there is a need to allocate additional short term deliverable sites to meet City Deal growth commitments by 2026. There is a need for new allocations in Long Stratton to make up for the failure of the 1,800 home allocation to deliver a single dwelling (despite forecasts that it would have delivered 650 dwellings by the end of 2020/21) and also to address the unsustainable over-allocation to small villages and to meet the City Deal growth commitment by 2026. The delayed delivery of the 1,800 home allocation in Long Stratton is due to the failure of the Council to ensure that the allocated development could viably deliver the required bypass to the town.</p> <p>Seeks the allocation of GNLP0509 – Land south of St Mary’s Road, and recounts that a planning application (ref. 2017/0810) for 52 dwellings and large areas of open space was submitted by Orbit Homes in March 2017 and recommended for approval by officers at Planning Committee on 12th September 2018. The Inspector dismissed the appeal on 23rd August 2019 for reasons relating to conflict with the locational policies in the development plan and some limited landscape/visual harm caused by the open space proposed.</p>	<p>The issues raised here are addressed by the site assessment work, and GNLP0509 continues to be considered unsuitable for inclusion.</p> <p>The growth strategy is considered appropriate, both in terms of housing numbers and distribution of development. This includes a scale of growth to meet the City Deal. As paragraph 185 says. “Our overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal.”</p> <p>As to Long Stratton the growth strategy remains appropriate. As paragraph 365 says. “Owing to the scale of the existing commitment in Long Stratton, which will both provide a bypass (see paragraph 230) and the growth of services supporting its classification as a main town, this plan does not make further allocations in addition to Long Stratton’s Area Action Plan (AAP).”</p>	No change
Settlement Map	Rosconn Group (Ben Ward, Senior Planning Manager) [19994]	24264	Object	<p>Objects to the fact that no allocations are proposed within the Part 2 Sites Plan for the settlement. Seeks allocation of one of two development options south of Flowerpot Lane (refs: GNLP4033/GNLP4034). GNLP4034 which extends to 7.48 hectares in area and is being promoted for approximately 150 dwellings, open space and associated infrastructure. GNLP4033 which extends to 33.79 hectares and is being promoted for approximately 700 dwellings, open space, community facilities and associated infrastructure. This statement is supported by a technical note: TN01 Preliminary Transport & Access Review prepared by Cotswold Transport Planning (March 2021)</p>	<p>Planning applications in respect to the Area Action Plan allocations are being considered, with good prospects for a favourable determination in 2021. Likewise, good progress is being made in funding the new by-pass, with a target for construction to begin in 2023. On this basis the growth strategy for Long Stratton as set out in the GNLP remains appropriate. For which paragraph 365 says. “Owing to the scale of the existing commitment in Long Stratton, which will both provide a bypass (see paragraph 230) and the growth of services supporting its classification as a main town, this plan does not make further allocations in addition to Long Stratton’s Area Action Plan (AAP).”</p>	No change

Wymondham

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
4.56 4.64	Mrs Janet Skidmore [19326] (Carter Jonas LLP)	23511	Object	Seeks land south of Gonville Hall Farm in Wymondham GNLP0320 to be allocated. Stating there are no significant constraints to the promoted development. The committed development at land to the north of Gonville Hall Farm is currently under construction, and therefore the promoted development at land south of Gonville Hall Farm will in due course be adjacent to the built-up area of the town. A number of site specific technical reports have been prepared.	The issues raised here are addressed by the site assessment work, and GNLP0320 continues to be considered unsuitable for inclusion. As to Wymondham, the proportion of growth is considered appropriate. As stated in the GNLP, Wymondham has a total deliverable housing commitment of 2,615 homes between 2018-2038. This is a significant commitment, and provides ample supply while the AAP is reviewed, and other options (such as new settlements) are investigated.	No change
4.56 4.60 4.62 0354R	Mrs Janis Raynsford [13526]	23696 23571 23572 23573 23614	Object	<p>Objects to GNLP0320, saying that the landowner's opinion that the same constraints apply to this site as for the nearby 335 housing site is disingenuous.</p> <p>Objects to GNLP0006, GNLP0525 GNLP2155 GNLP3013 and 2014/0799, as these would totally urbanise this hitherto unspoilt and natural landscape.</p> <p>Objects to GNLP0354R which seeks to destroy this unique rural part of Wymondham, and harm views of the Abbey, and Cavick House.</p> <p>Considers the assessment of GNLP0354 to be incorrect, and to be in conflict with Development Management Policies (DPD) policy 4.5, "Landscape Character and River Valleys".</p>	The issues raised here are addressed by the site assessment work, and no changes are deemed necessary. The majority of objections made are in relation to sites that the GNLP Team also regards as unsuitable for inclusion in the Plan. The two allocations (GNLP0354R and GNLP3013) allow relatively small-scale incremental growth, thereby reflecting the already substantial development commitment in Wymondham. Constraints, such as heritage and landscape, have been assessed; and, the policies are regarded as sound.	No change
4.56 4.62	Mr Martijn Koster [19929]	23692 23691	Object	<p>Objects to GNLP0320, too remote from Wymondham, scale is disproportionate, effect on Gunville Hall's setting, traffic in Sutton lane, secondary school capacity constraint, and that the adjacent permission is not fully delivered.</p> <p>The plan should explicitly formulate a strategic gap between Wymondham and Sutton. GNLP0320 would obliterate the gap to Sutton.</p>	<p>The issues raised here are addressed by the site assessment work, and GNLP0320 continues to be considered unsuitable for inclusion.</p> <p>As to establishing a strategic gap policy between Wymondham and Sutton it is not deemed a matter of soundness. Should a review be needed for a new strategic gap policy it would most likely be done as part of reviewing the Wymondham Area Action Plan, or possibly the Neighbourhood Plan if deemed a priority of the Steering Group.</p>	No change
4.56 4.65 0354R	Ms Cecilia Riccardi [14061]	23727 23608 23609	Support	Supports the view that site GNLP0320 is an unreasonable alternative. Factors are heritage landscape, wildlife, health, education and retail needs.	<p>GNLP0320 continues to be considered unsuitable for inclusion.</p> <p>The comments regarding vehicular access only being from the new roundabout that is</p>	Make a minor modification to policy requirement 5 to remove the reference to Abbey Road which has been included in error and clarify

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>With regard to GNLP0354R please consider replacing the first sentence with: "This site is located to the south-west of the town with vehicular access proposed only from the to be constructed new roundabout at the junction of the B1172 London Road and the Old London Road." To ensure the policy issue itself is sound: Point 2: Please consider replacing this so that it echoes the wording above, as in: "Vehicular access from the B1172 London Road and the Old London Road via the to be built roundabout, with a minimum 5.0 metre carriageway width, and 2.0 metre footway provision across the site frontage. Consideration to be given whether a footway should stretch the length of the site to the new roundabout junction. Rationale: This would provide consistency and put access beyond doubt. It would improve the safety of pedestrians. Point 5: Please consider removing "Abbey Road or" from this sentence. Rationale: Abbey Road is unsuitable as an access/egress point for the Johnson's Farm site. My submission to the Regulation 18 stage with accompanying map which showed the winding nature of Abbey Road and its proximity to a children's playground refers.</p>	<p>proposed to be constructed at the junction of the B1172 London Road and Old London Road are recognised and are technically correct. However the GN authorities do not intend to make changes to the plan to reflect this as the provision of this roundabout is dependent upon the delivery of a nearby housing estate and if this were not to happen for any reason an alternative access strategy for this site would be needed from the London Road.</p> <p>The point regarding the unsuitability of Abbey Road as an access/egress point is noted and it would appear that this has been left in the policy in error following the removal of another requirement for access to be either through Abbey Road or Preston Avenue at the earlier Regulation 18C stage and should therefore be deleted. As this is an error the GN authorities would suggest that this can be done as a minor modification along with clarifying that Preston Avenue is pedestrian/cycle access only.</p>	<p>that Preston Avenue is pedestrian/cycle access only. Amend the text to read: 'The trees and hedgerows bordering the site will be protected, enhanced and incorporated into the scheme, acknowledging that pedestrian/cycle access at Preston Avenue will be required'.</p>
4.56	Environment Agency (Eastern Region) [13069]	23786	Support	<p>We are raising a generic comment for all Wymondham site allocations: The latest version of the Water Cycle Study shows that Wymondham WRC will be over capacity post growth. As stated, the latest findings and recommendations from the WCS should be incorporated and reflected in the Local Plans and Site Allocations.</p>	<p>The comment is noted and the GNLP Team is aware of this issue. Policy 2 of the GNLP makes clear that developers should engage early with Anglian Water to ensure capacity exists or can be found in the wastewater network, as otherwise there is a risk to the timing of development. Nevertheless, allocations in Wymondham are considered deliverable in the plan period, the policies as drafted are sound, and there is no need for modifications.</p>	No change
4.64 0354R	RJ Baker & Sons [19063] Cheffins	23491 23492	Support	<p>Our clients own Site GNLP0354 (land at Johnson's Farm) and we support the allocation of this land for residential development in the Submission Plan.</p> <p>Our clients have recently commissioned more detailed technical work in respect of highways and drainage matters and this has confirmed earlier work and demonstrated the site to be relatively constraint-free. We have one minor comment on the wording of the policy. In respect of policy criteria 3: 'Provision of a 2m wide pedestrian/cycle access via Preston Avenue' – it should be made clear that this is perfectly possible within the site allocation area. Beyond the site, and</p>	<p>The comment is noted and gives confidence of the deliverability of GNLP0354R. It is also noted that minor modifications are sought but the GNLP Team is of the view that the policy as drafted is sound. It is understood that beyond the site boundary, and in this case relating to Preston Avenue, improvements for pedestrians and cyclists might be limited due to third-party land and the extent of highway land, but this could be reviewed at the planning application stage.</p>	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				along Preston Avenue itself, any such provision will be focussed on the existing highway arrangements.		
	Lanpro Services Ltd [14057]	24299		The Local Plan is unsound as it fails to provide for sufficient growth aspirations, and seeks the allocation of GNLP4023, North of London Road, Wymondham. Considers that GNLP0354R should be deallocated for its substantial harm to Grade 1 Listed buildings, as better alternatives exist.	The issues raised here are addressed by the site assessment work, and GNLP4023 continues to be considered unsuitable for inclusion. In respect to GNLP0354R its allocation continues to be justified, and mitigations are set in the policy, including a requirement to safeguard the Conservation Area and listed buildings to the north.	No change
0354R	Wymondham Heritage Society [19193]	23915		Policy GNLP0354R would harm the rural gateway to Wymondham from the west meaning the Grade 1 Wymondham Abbey would only be seen obliquely through housing. The land is elevated and further building here would effectively destroy the current views. Any housing would also compromise the exceptional Grade 1 listed Cavick House and ancillary buildings which create one of the most significant groups of historic buildings in the Conservation Area. Considers the assessment of GNLP0354 to be incorrect, and to be in conflict with Development Management Policies (DPD) policy 4.5, "Landscape Character and River Valleys".	The GNLP0354R policy as drafted is considered to be sound. In selecting this site for allocation regard was given to heritage assets, and as a mitigation measure criterion 4 says: "Mitigation of the impact of development on the Conservation Area and listed buildings to the north of the site."	No change
4.64	Pigeon Investment Management Ltd	24068	Object	Please see the section addressing the Sites Plan in the attached representations submitted on behalf of R Mason in support of the allocation of Land at Rightup Lane, Wymondham site GNLP0355. Recommendation: Given the evident sustainability credentials of Land at Rightup Lane, Wymondham and the absence of any justification for not allocating this site, it should be allocated within the GNLP.	The issues raised here are addressed by the site assessment work, and GNLP0355 continues to be considered unsuitable for inclusion.	No change
Settlement Map Assessment Booklet	Welbeck Strategic Land III Ltd [19925] James Bailey Planning Limited	23669 24525	Object	Welbeck land strongly disagrees with the spatial growth strategy that is being proposed by the GNLP in the Reg 19 document. The new approach being taken towards the Village Clusters is not supported and is considered to be both unsound and unjustified. The identification of Village Clusters based on primary school catchment areas is also questioned as a suitable or sustainable approach to future planning growth.	The issues raised here are addressed by the site assessment work, and GNLP0006 continues to be considered unsuitable for inclusion. As to Wymondham, the proportion of growth is considered appropriate. As stated in the GNLP Wymondham has a total deliverable housing of 2,615 homes between 2018-2038. This is a significant commitment, and provides ample supply while the AAP is reviewed, and other options (such as new settlements) are investigated.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<p>At the same time, there is also a continued reliance on allocating undelivered, or stalled sites, which is also considered to be unjustified and unsound.</p> <p>Overall, there appears to be no justifiable reason or rationale for the change from the approaches between the Reg 18(c) and the Reg 19 GNLP documents.</p> <p>Welbeck Land do not agree with the absence of “reasonable alternative sites” for Wymondham, and especially the reluctance of the GNLP to provide reserve sites for further additional growth towards the end of the plan period. Development at Norwich and along the Tech Corridor will create an increasingly strong and economically attractive region, thereby driving the availability of funding as per Policy 1 for new infrastructure that caters for further strategic development.</p>	<p>As to the decision to drop the 1,000-home contingency for Wymondham, this was taken through consultation with elected councillors. As explained in the Part 1 Strategy, sufficient sites are either committed to or allocated. Equalling a potential housing supply 49,492 homes, and providing a 22% buffer upon local housing need. On this basis GNLP0006 was revised to an ‘unreasonable’ site for inclusion.</p> <p>The approach taken to windfall development and to development via the South Norfolk Village Clusters is considered to be realistic and deliverable. As well as being sustainable, the availability of smaller sites in village clusters will also help to diversify the house-building market locally. Furthermore, the Regulation 18 consultation on the South Norfolk Village Clusters Plan is imminent.</p>	
0354R	Historic England	24035	Support	We welcome bullet point 4 relating to listed buildings and the Conservation Area.	Comment noted.	No change

Key Service Centres (chapters and site assessment booklets)

Acle

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Acle 5.3	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23419	Object	Legal and soundness objection raised because there was no consultation on the 340 new homes, only for 200 homes which had many objections. The SCI has not been complied with.	The SCI has been complied with. The site promoter revised the site during Reg18C. The revised site boundary, road layout and increase in housing numbers was assessed and the changes to the site were assessed as acceptable to deliver the link road.	No change
GNLP0378 R /2139R	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23375	Support	Please also mention protecting dark skies of the Broads	We consider the policy is sound. However, if the Inspector is minded to make a change to the policy in this regard, BP3 could be amended to include reference to dark skies. As a Proposed Modification, the GN authorities have no objection to this.	No change, but if the Inspector is minded to make a change to the policy BP 3 could be amended to "The site's proximity to the Broads, including any impact on dark skies" as a Proposed Modification.
GNLP0378 R /2139R	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23420	Object	Legal and soundness objection raised as the allocation does not include 1ha of open space promised in adjacent permission in any plans for housing, as well a new allocation of open public space	Site policy does require open space. The location, type and quantum will be determined through planning applications.	No change
GNLP0378 R /2139R	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23421	Object	Legal and soundness objection raised as the land is at risk of flooding from the nearby reservoir. Reduce the number of homes to take the flood risk into account.	Risk of flooding from the reservoir is addressed in site policy. The site is capable of mitigation.	No change
GNLP0378 R /2139R	Brian Iles [19883]	23601	Object	Claim that the document is not legal, not sound, and does not comply with the duty to cooperate, as the link road would cost £3m if it is to be capable of carrying sugarbeet lorries. Therefore the site is not viable. Alternative cheaper route exists. Insufficient local communication.	Developers claim the site will be viable with the link road. Site promoter revised site during Reg18C consultation. The Duty to Cooperate is about strategic scale cooperation on cross boundary issues.	No change
GNLP0378 R /2139R	Mrs Claudia Dickson [19484]	23826	Object	Legal and soundness objection raised as the sites were changed between Reg18C and Reg19, rising from 200 to 340 homes and land area increased from 15ha to 25.5ha. Acle residents were not consulted.	The site promoter revised the site during Reg18C. The revised site boundary, road layout and increase in housing numbers was assessed and the changes to the site were assessed as acceptable to deliver the link road.	No change
GNLP0378 R /2139R	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23852	Object	Soundness objection raised as there are water mains within the site boundary, which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.	Minor modification to add additional wording to the supporting text for clarity. Before the penultimate sentence in paragraph 5.5, insert:

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				read 'the safeguarding of suitable access for the maintenance of water supply infrastructure'.		"There is an existing water main in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance"
GNLP0378 R /2139R	Lovell (Mr Will Wright, Land & Partnership Manager) [17174]	24346	Object	Soundness objection raised as (although there are no known constraints which affect the site's viability or deliverability) site promoter suggests additional policy requirement re phasing of development infrastructure (link road).	The policy wording is considered appropriate. The masterplan should include phasing of all elements of the development at planning application stage.	No change
ACL1	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23853	Object	Soundness objection raised as there are water mains within the site boundary, which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of water supply infrastructure'.	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity '.	Minor modification to add additional wording to the supporting text for clarity. Before the final sentence in paragraph 5.6, insert: "There is an existing water main in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance"

Blofield

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Blofield map	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]	23705	Object	Soundness objection raised as Blofield settlement boundary excludes recent and planned development to the north of the village, east of Plantation Road.	The application referred to is undetermined. Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Blofield map	Mr Magnus Magnusson [14502]	23936	Object	Soundness objection raised as site GNLP4013 should be allocated; it is less constrained than GNLP2161 and will add to the supply buffer.	Site GNLP2161 is deliverable. The site assessment booklet for Blofield concludes that site GNLP2161 is the most suitable site for allocation. Any further sites, added to the committed sites in Blofield, may overwhelm the village's services and site GNLP4013 is constrained by surface water and river flooding. The plan already has a significant delivery buffer.	No change
Blofield map	Jack Pointer [19981]	24163	Object	Soundness objection raised as short- and long-term social changes (including the pandemic) mean the delivery buffer is insufficient and a further 20% is needed. Site GNLP0252R is less constrained than GNLP2161 and will add to the supply buffer.	Site GNLP2161 is deliverable. The site assessment booklet for Blofield concludes that site GNLP2161 is the most suitable site for allocation. Any further sites, added to the committed sites in Blofield, may overwhelm the village's services. The plan already has a significant delivery buffer.	No change
BLO1	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24036	Support	We welcome the addition of criterion 2 that references the grade II listed Manor Farm Barn to the south of the site.	Noted	No change

Brundall (Including Postwick with Witton)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Brundall, 5.18	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24099	Object	Soundness objection raised as previously we have proposed a school on GNLP0352 but this was not assessed. Site assessment process did not take account of Reg18C reps. No allocations in Brundall owing to constraints which either do not exist or which do not apply to at least some of the potential sites. The absence of allocations also does not provide for the identified educational needs of the settlement which could be provided on GNLP0352.	A Reg18C representation made by Pigeon by email in 2020 and in this rep Pigeon changed the proposed use of the site by including land for a primary school. This Reg18C representation email was received by us but had unfortunately been overlooked by us. Since discovering the oversight, we have considered the content of the Reg18C rep and reassessed site GNLP0352 in the light of the proposed change. The reassessment included discussion with Children's Services to ascertain the need for a primary school in Brundall. In order to allow a fair consideration of the site, the school element of the assessment considered the position as it was in March 2020, by which time plans were well under way for a new school in Blofield, which negate the need for a new school in Brundall. Other elements of the site assessment have also been reconsidered. The	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					result of the reassessment process is that the site assessment result is unaltered and the site remains unsuitable.	
BRU2	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	23259	Object	Unsound to allocate for open space as housing permitted and development has commenced.	In order to preserve the level of open space in the event of the permission lapsing, the open space allocation is considered appropriate.	No change
BRU3	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23854	Object	Soundness objection raised as there is a foul sewer within the site boundary, which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity '.	Minor modification to add additional wording to the supporting text for clarity. At the end of paragraph 5.24, insert: "There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the open space development including safeguarding suitable access for maintenance"

Hethersett

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Hethersett 5.28 Hethersett site assessment booklet	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24235	Object	Soundness objection raised as site assessment booklet site references are confused, meaning it is unclear which is the reasonable alternative site. Constraints in HELAA can be mitigated on GNLP4053 which should have been shortlisted. School on GNLP4052 is needed, Sport England state there is no need to justify provision of sports facilities. No reason not to allocate GNLP4054 for housing.	Page 40 of the Hethersett site assessment booklet contains an error in that the site descriptions have been allocated to the wrong references. The table at Stage 5 is correct. Officers in Children's Services have been involved in the GNLP site assessment process. No change is considered necessary.	Minor modification to correct error on page 40: Second paragraph, heading should read "GNLP4054, North and south of Hethersett Road, 32.42ha, 400 dwellings" Fourth paragraph, heading should read "GNLP4053, Station Lane, 5.59ha, care home/village plus open space".
Hethersett /KSCs/SA	ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]	24409	Object	Legal and soundness objections raised as SA finds allocations in KSCs to be less sustainable. E.g. GNLP4054 in Hethersett.	GNLP4054 in Hethersett is not allocated. KSCs are sustainable locations the services of which support a wider population. The proportion of growth in KSCs is considered appropriate to support services in these centres serving rural hinterlands.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
HET1	Hethersett Parish Council (Clerk) [14326]	23837	Object	Soundness objection raised as Hethersett services lack capacity, e.g. the post office is under threat of closure, the library is on reduced opening hours, the surgery is over-subscribed, the business centre is now a private health centre. The reference to an uplift in number of homes implies increased density. The use of the term "approximate" when allocating housing numbers is unsound, more precise language needed including reference to road names.	Local service information is constantly subject to change. The proportion of growth in Hethersett is considered appropriate to support services such as the post office and library. Regarding the surgery, evidence studies engaged with relevant providers to identify the need for additional infrastructure to serve the proposed growth and included these in the plan. Approximate housing numbers give flexibility for applications which may produce further evidence.	No change
HET1	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24037	Support	We welcome the reference to archaeology at criterion 18.	Noted	No change
HET2	Hethersett Parish Council (Clerk) [14326]	23838	Object	Soundness objection raised as language is too vague. Will there be a care home, open space, or housing?	The site is allocated for extra care housing, with flexibility to provide for evolving care needs and produce a viable scheme.	No change
HET3	Hethersett Parish Council (Clerk) [14326]	23839	Object	Soundness objection raised as the site is described as open space/burial ground. The archaeological site needs to be protected.	The site is not described as a burial ground. The site policy requires archaeological surveys.	No change
HET3	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23856	Object	Soundness objection raised as there are water mains within the site boundary, which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of water supply infrastructure'.	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity'.	Minor modification to add additional wording to the supporting text for clarity. At the end of paragraph 5.33, insert: "There is an existing water main in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the open space development including safeguarding suitable access for maintenance."

Hingham

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Hingham 5.36 (Rep 5 of 9)	Hingham Town Council (Mrs A	24259	Object	Legal and soundness objection and claim that duty to cooperate has not been complied with, as the landowner of site GNLP0503 has withdrawn it.	The withdrawal of GNLP0503 occurred during the Reg 19 consultation, but this in itself does not make the plan unsound. Housing numbers and	No change, but see rep ID 23337 for withdrawal of site GNLP0503.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Doe, Clerk) [12974]			Hingham housing figures don't address housing need within community or vacant properties. Development should be phased and affordable. Allocations should stipulate maximum. Decades of housing with no infrastructure improvements.	need are calculated across the entire Greater Norwich area, not by settlement. Affordability and infrastructure are addressed in policies 4 and 5.	
Hingham 5.37	Mrs Zoe Jones [19906]	23557	Object	Soundness objection raised as site 0520 is rich in wildlife and close to SSSI and will cause further flooding on Seamere Road.	The site is in agricultural use, net gain for biodiversity will be enforced through Policy 3 for all sites and impacts on SSSI (600m from closest part of the site) can be mitigated. Flood issues are addressed in site policy.	No change
Hingham settlement map	Mr Alec Brown [19967]	23919	Object	Soundness objection raised as development should minimise impact on wildlife and village amenities. Develop in other areas on brownfield sites. We oppose development on HTC preferred sites GNLP0298 and GNLP0335 due to traffic and wildlife impacts, sites should be rewilded.	These issues have been considered when assessing sites in Hingham. Net gain for biodiversity will be enforced through Policy 3 for all sites. The GNLP aims to maximise development on brownfield sites.	No change
Hingham settlement map	Mr Henry Isotta [19286]	23954	Object	Soundness objection raised as allocation is not positively prepared, no safe walking route to services and surface water threatens existing development. HELAA criteria poorly applied, illogical conclusions reached. Pedestrian and vehicular access to 0520 unsound due to need to cross B1108 and TPO trees. Site assessment does not consider net gain biodiversity. Impact on listed buildings policy is flawed and incompatible proximity to B2 development. No neighbourhood plan in Hingham, but NPPF implies local opinion should carry weight, and GNLP answer to Q3 in Board meeting 30/9/20 states significant weight given. Allocation 0520 not consistent with these. 0298 should be allocated.	The HELAA used the County-wide adopted methodology, and relied on published evidence and specialist advice. The highway issues related to the various sites in Hingham have been considered by the Highway Authority who have responded to queries since the assessment process. The Highways Authority considers the highway issues capable of mitigation. Net gain for biodiversity will be enforced through Policy 3 for all sites. Historic England guided policy on listed buildings. Local opinion does carry weight but in this instance did not override evidence, which showed highway issues on site 0298 could not be mitigated.	No change
Hingham map (Rep 7)	Hingham Town Council (Mrs A Doe, Clerk) [12974]	24258	Object	Legal and soundness objection, and challenge compliance with duty to cooperate because Hingham map should include the town centre area. Without this the Co-op has been wrongly judged to be the centre of Hingham and the GNLP is inconsistent with the Development Management Policies document.	Development Management Policies documents and GNLP are components of the development plan – there is no inconsistency. Distance to day-to-day food shopping was one of many criteria in HELAA assessment; this does not assume the Co-op is the centre of the town.	No change
GNLP0503	Hall Farm (Hingham) Ltd (Des Shingfield, Director) [19837]	23337	Object	Soundness objection raised, as a member of the family who is no longer involved with the land put this forward. We wish to withdraw the site.	We would not object to the site being removed from the GNLP at the Inspector's direction.	No change prior to submission, but if the Inspector is minded to remove site GNLP0503 as a Proposed Modification, the GN authorities have no objection to this .
GNLP0503	Mr Alec Brown [19967]	23917	Object	Soundness objection raised as development should minimise impact on wildlife and village amenities. Develop in other areas on brownfield sites. We oppose	These issues have been considered when assessing sites in Hingham. Net gain for biodiversity will be enforced through Policy 3 for	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				development on HTC preferred sites GNLP0298 and GNLP0335 due to traffic and wildlife impacts, sites should be rewilded.	all sites. The GNLP aims to maximise development on brownfield sites.	
GNLP0503 Hingham site assessment booklet (Rep 1)	Hingham Town Council (Mrs A Doe, Clerk) [12974]	24254	Object	Legal and soundness objection, and challenge compliance with duty to cooperate because landowners wish to withdraw site, therefore it is not deliverable. Also no highway evidence to show site policy for footway is achievable or to address reps made at Reg18C.	The Highways Authority considers the highway issues capable of mitigation. However, this site was withdrawn by landowners during Reg19 publication period. No changes are required for soundness, but the GN authorities would not object to the site being removed from the GNLP at the Inspector's direction.	No change prior to submission, but if the Inspector is minded to remove site GNLP0503 from the GNLP as a Proposed Modification, the GN authorities have no objection to this.
GNLP0520	Mr Geof Bedford [19004]	23293	Object	Legal and soundness objection, and challenge compliance with duty to cooperate because Hingham Road Safety Campaign 2020 report finds Norwich Road unfit for the 21 st century and development of this site would permanently block necessary improvements being made. Concerns include: development up to oak tree line, requirement to cross the road with no pedestrian priority, speeding drivers, blind bend, narrow road, poor footpath provision, no surface water drains on highway.	The Highway Authority, a partner in the GNLP, asserts that these issues are capable of being mitigated.	No change
GNLP0520	Mr Alec Brown [19967]	23918	Object	Soundness objection raised as development should minimise impact on wildlife and village amenities. Develop in other areas on brownfield sites. We oppose development on HTC preferred sites GNLP0298 and GNLP0335 due to traffic and wildlife impacts, sites should be rewilded.	These issues have been considered when assessing sites in Hingham. Net gain for biodiversity will be enforced through Policy 3 for all sites. The GNLP aims to maximise development on brownfield sites.	No change
GNLP0520	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24038	Support	We welcome the addition of criterion 9 to reference the two grade II listed buildings (Lilac Farmhouse and Blenheim Cottage) to the south of the site.	Noted	No change
GNLP0520	Bidwells (Mr Iain Hill, Partner) [16273]	24191	Object	We support the allocation, but for consistency we suggest you amend policy to state 'at least' 80 new homes instead of 'approximately'. We note 0503 is withdrawn. GNLP0520 can provide 100 dwellings and comply with policy 2 density.	No changes are required for soundness, however if the Inspector is minded to make a change for consistency, the GNLP authorities have no objection to this.	No change prior to submission, but if the Inspector is minded to make a Proposed Modification, the GN authorities would have no objection to this change to the introduction to policy GNLP0520: Delete "approximately" and insert "at least".
GNLP0520 Hingham site	Hingham Town Council (Mrs A Doe, Clerk) [12974]	24255	Object	Legal and soundness objection, and challenge compliance with duty to cooperate because there is no evidence that past reps on surface water runoff have	Statement of Consultation and assessment booklets show reps have been considered. Lead Local Flood Authority officer advice informed	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
assessment booklet (Rep 2)	Doe, Clerk) [12974]			been considered or further investigations have taken place. Site policy only deals with site, not lower surrounding areas. No evidence that site promoter's surface water plan will prevent flooding on Seamere Road. Bias in favour of developer against HTC. No evidence to support pedestrian refuge. Detrimental impact on landscape: HTC previous rep was disregarded and misrepresented in SoC. Allocation is contrary to Development Management Policies doc and adjacent allocation HIN1. Eastern approach will be dominated by large development of modern housing. Historic environment and landscape not considered adequately. Visibility policy contradicts TPO policy Existence of HIN2 makes site unsafe.	policy which requires surface water issues to be investigated and mitigated. The Lead Local Flood Authority is unaware of any evidence that The Hops has increased flood risk in the surrounding area; surface water infrastructure at The Hops appears to have been installed and is functioning to the approved design. Previous rep from Hingham TC was summarised for SoC but full rep was considered. Development Management Policies documents and GNLP are components of the development plan – there is no inconsistency. All elements were considered. Highways Authority considers highway safety issues can be mitigated.	
HIN2	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23857	Object	Soundness objection raised as there are surface water sewers within the site boundary, which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of surface water drainage infrastructure'.	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.	Minor modification to add additional wording to the supporting text for clarity. At the end of paragraph 5.40, insert: "There is an existing surface water sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance"
HIN2	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24039	Support	We welcome the addition of criterion 4 to reference the grade II listed Alexander's Farmhouse lies to the east of the site and White Lodge, also listed at grade II lies to the north of the site.	Noted	No change

Loddon and Chedgrave

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
GNLP0312 and para 5.42	Broads Authority (Ms Natalie Beal,	23374	Support	Please mention dark skies of the Broads	We consider the policy is sound. However if the Inspector is minded to make a change to the policy in this regard, an additional bullet point	No change, but if the Inspector is minded to make

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Planning Policy Officer) [12415]				could be added to include reference to dark skies. As a Proposed Modification the GN authorities have no objection to this.	a change to the policy BP8 could be inserted: "The site's proximity to the Broads, including any impact on dark skies" as a Proposed Modification.
Loddon & Chedgrave settlement map	Mr Magnus Magnusson [14502]	23246	Object	Soundness objection raised as strategy for Chedgrave fails to allocate site GNLP4058, which is more suitable than GNLP3012 or GNLP0463R. Total allocations in GNLP are insufficient and rely on windfall.	Allocating the site (which was submitted late in the process) in addition to the sites already selected may overwhelm local services. The GNLP allocates a significant buffer over identified housing need. Windfall development is additional to this.	No change
Loddon & Chedgrave settlement map	Mr Glyn Davies [19834]	23398	Object	Plan is unsound as settlement boundary in Chedgrave excludes site under construction.	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries and the inclusion of small sites less than 0.5 hectares were excluded because of this, however amendments to settlement boundaries could be made through neighbourhood plans or a future review of the local plan.	No change to plan.
Loddon & Chedgrave settlement map	Chedgrave Parish Council (Ms Hayley Goldson, Clerk) [14322]	24087	Object	Duty to co-operate fails, entire process has been inadequate re involvement of public.	The DtC is about strategic scale cooperation on cross boundary issues. The LPAs believe that the three Regulation 18 consultations, including a draft plan with reasonable alternatives for housing sites and numbers in the main towns, followed by the Regulation 19 publication stage, constitute effective consultation. The SCIs of the districts, albeit altered to address Covid-19 restrictions, have been complied with.	No change
GNLP0312	Mr Simon Gibbs [19049]	23250	Object	Unsound and duty to co-operate fails. Site is opposite our home. We are concerned at disruption from building site and car headlights, impact on wildlife and loss of farming land.	These issues do not cause the plan to be unsound, but amenity issues would be considered and likely mitigated at planning application stage.	No change
GNLP0312	Loddon Parish Council (Ms Emily Curtis, Town Clerk) [13830]	23254	Object	Unsound and duty to co-operate fails, suggest changes to policy wording. Insert density, open space, include affordable housing and mix of house type, highway improvements and s106 contributions to local facilities.	Elements such as density and open space are incorporated within design and layout elements of policy. Policy 5 covers housing types. The highway elements and s106 contributions will be addressed at planning application stage.	No change
GNL0312	(Mrs Debbie Mack, Historic Environment	24040	Support	We welcome the addition of criterion 3 to reference the listed buildings and conservation area.	Noted	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Planning Adviser) [19652]					
GNL0312	Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	24368	Support	Request change to policy: single access plus emergency access to site. Application expected Q2 2021.	The Highway Authority view is that a development of this scale requires two vehicular accesses.	No change
GNL0463 R	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24041	Support	We welcome the addition of criterion 2 to reference the listed buildings and Langley Park registered park and garden	Noted	No change
GNL0463 R	Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	24294	Support	Support allocation of site. Development on this site can create a walkable neighbourhood. Proximity to Langley Park and Broads can be mitigated. Outline application being prepared.	Noted	No change
LOD3	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23858	Object	Soundness objection raised as there are surface water and foul sewers within the site boundary, which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure'.	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity'.	Minor modification to add additional wording to the supporting text for clarity. At the end of paragraph 5.47, insert: "There is an existing surface water and foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance."

Poringland, Framingham Earl and Framingham Pigot (including well-related parts of adjacent villages)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Poringland 5.49	Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]	23329	Support	Pleased that GNLP considers settlement and therefore parts of adjacent parishes.	Noted	No change
Poringland 5.50	Mr Chris Troise [15351]	23287	Support	Supports no new allocations, considering extant permissions.	Noted	No change
Poringland 5.50	Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]	23330	Support	Supports no new allocations, considering extant permissions. Would like to see local trajectory.	Support noted. There are delivery forecasts in the GN Housing Land Supply Assessment in AMR section on SN website.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Poringland 5.50	Glavenhill Limited [19394]	23821	Object	Unjustified and unsound not to allocate in Poringland to support services. Many committed sites have been delivered. Other sites could provide infrastructure. Allocate GNLP0494R.	Commitment reflects position at GNLP base date of April 2018. Poringland has grown significantly in recent years and services need to adjust capacity. Site promoted for school is considered unsuitable.	No change
Poringland 5.50	Glavenhill Limited [19394]	23868	Object	Unjustified and unsound not to allocate in Poringland to provide primary school and recreation facilities. Many committed sites have been delivered. No new country park in S Norfolk which is deliverable. Allocate GNLP0485R – highway constraints are unjustified and offer of school has been overlooked.	Commitment reflects position at GNLP base date. Poringland has grown significantly in recent years and services need to adjust capacity. Site was considered but found unsuitable for school and access is constrained for all uses proposed.	No change
Poringland 5.51	Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]	23331	Object	Unsound, illegal and duty to co-operate fails. Refers only to environment protection, excludes enhance environment and improve biodiversity as proposed NPPF changes.	Policy 3 applies to all sites allocated in the plan and covers these elements.	No change
Poringland settlement map	G Newman [16792]	23909	Support	Support decision not to allocate sites on Burgate Lane (GNLP0391 A and B and GNLP2153)	Noted	No change
Poringland settlement map	Mr Alan Harvey [18641]	23912	Support	Support decision not to allocate sites GNLP2111 and GNLP2124.	Noted	No change
Poringland settlement map	Mr Richard Bacon [17000]	24381	Object	Plan does little to address education needs in Poringland. NCC has need and funding allocation for primary school in Poringland, plan should address this.	The plan acknowledges the need for a primary school in Poringland. However, no suitable site has been identified. Ongoing discussions are taking place with NCC to find a suitable site for a primary school.	No change
POR3	Poringland Parish Council (Mrs Faye LeBon, Parish Clerk) [19095]	23332	Support	Support matters to be addressed by development but would like to add peak time traffic analysis/ mitigation and construction management plan, plus review of pathways/cycle ways	These elements would be addressed during the planning application process.	No change

Reepham (including Booton, Guestwick, Heydon, Salle and Wood Dalling)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Reepham 5.54	Mr Richard Taylor [19828]	23715	Object	Soundness objection and challenge compliance with duty to cooperate as although I support no new allocations in Reepham, the permissions should read 176 + 60 bed care home as current application.	The current application is undetermined. Commitment does not include undetermined applications and reflects the position at the base date of the plan.	No change
Reepham 5.54	Mr Richard Taylor [19828]	23716	Object	Soundness objection and challenge compliance with duty to cooperate as if 20200847 is permitted, commitment would be 176+60 bed care home. Enforce PINS decision on appeal 100 homes on REP1.	The current application is undetermined. Commitment does not include undetermined applications. Planning applications are dealt with separately.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Reepham 5.54	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24119	Object	A soundness objection is raised in support of site GNLP0353R. No allocations are made in Reepham due to constraints which do not exist or do not apply. Healthcare needs have not been provided for despite significant shortfall in primary healthcare floorspace identified in GNLP Infrastructure Needs Report. Needs of local business (Original Cottage Company) not provided for (despite their public consultation Dec 2019) contrary to para 84 of NPPF. Suggesting application route is contrary to paragraph 20c of the NPPF. Previous reps not taken into account e.g. GNLP assessed 100 – 200 homes, open space and GP expansion, but Pigeon proposed relocation of a local employer, expansion of GP surgery, with 50 homes during Reg18C.	The GNLP allocates employment land sufficient to allow choice and competition. However, some businesses have very specific needs. Therefore the planning application process is considered the most suitable approach in this case. Likewise, the GP expansion could be addressed through planning application. This would not conflict with para 84 NPPF which states sites to meet local business and community needs in rural areas may be adjacent to or beyond existing settlements. GNLP strategic policies 1-7 address all issues required under para 20 of the NPPF. Pages 31 and 39 of Reepham site assessment booklet show that change of proposed use was taken into account. However, the Highways Authority view is unchanged, despite the access strategy provided.	No change
REP1	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23894	Support	Support requirement to evaluate indirect impacts on Broomhill Meadows CWS	Support noted.	No change
REP1	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24128	Object	Soundness objection raised as allocation is not deliverable, as evidenced by application 20200847, viability information of which shows 141 homes, only 20% affordable housing, and sports hall on alternative site.	The application is not likely to be determined before submission of the GNLP. Viability on the site is being tested through the application. App 20201183 for the sports hall is also undetermined. At the current time it is appropriate to continue with the allocation policy as drafted.	No change.
REP1	Julie Fielder [19979]	24148	Object	Legal and soundness objection raised as there has been inadequate public consultation due to pandemic. Original allocation not based on proportionate evidence re lack of infrastructure. Issues re application and concern for impact on wildlife.	The SCIs of the districts were amended to address the impact of the pandemic. The original allocation was found sound. The application is proposing non-policy compliant development, but this is outside the scope of the GNLP. Net gain for biodiversity will be enforced through Policy 3 for all sites and an ecological appraisal is required by site policy.	No change
REP1	Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	24174	Object	Support allocation but policy is unsound, does not represent optimum development solution. Sports hall location impractical for Reepham High School's operations. GNLP should plan for relocation of sports hall and increased dwellings on REP1 as per app 20200847. This would be viable at 20% affordable housing. Current density does not comply with Policy 2.	The application is not likely to be determined before submission of the GNLP. Viability on the site is being tested through the application. App 20201183 for the sports hall is also undetermined. At the current time it is appropriate to continue with the allocation policy as drafted. Policy 2 states minimum net density of 25 dph. The allocation allows land for non-housing uses.	No change.
REP1	Mr Norman Smith [13852]	24344	Object	Soundness objection raised as you are proposing housing outside settlement boundary. Exclude site from plan. Impacts on wildlife, loss of greenfield site.	Settlement boundaries evolve with successive plans. The former allocation is considered	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				Highway solution results in suburban solution in rural situation. Services lack capacity.	suitable to carry forward. Site policies address identified impacts and constraints.	
REP2	Mr Norman Smith [13852]	24345	Object	Permission 20180963 is inconsistent with policy REP2 so is unsound.	The permission is acknowledged. If it fails to be implemented in full, the allocation policy remains.	No change

Wroxham

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Wroxham 5.60	Hopkins Homes Limited (Mr Chris Smith, Development Planner) [14202]	24173	Object	Soundness objection raised as allocations should be made in Wroxham. GNLP contains unsubstantiated claims of traffic and air quality, perceived landscape impacts. Allocate GNLP2131 and/or GNLP2135.	Site GNLP2135 in particular has unacceptable highway and townscape impacts. Both sites are considered to have unacceptable traffic impacts and proximity to the Broads is a constraint.	No change
Wroxham settlement map	Wroxham Football Club (Mr Chris Green, LP Contact) [13297]	23935	Object	Legal and soundness objection raised, and challenge compliance with duty to cooperate as the Playing Pitch Strategy (BDC) has not been fully considered. Funds are available from Football Foundation for relocation of clubs. Wroxham PC support development of GNLP0041 which would allow WFC to relocate.	The playing pitch strategy has been considered. However, GNLP0041 is not considered suitable for redevelopment as housing. Wroxham PC rep from Reg18C supports GNLP approach.	No change

Site Assessment Booklets

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
KSC site assessment booklets (Blofield)	Mr Alan Dempsey [17658]	23244	Object	Unsound as reference to GNLP2149 suggests it remains under consideration. Remove all references to the site.	Page 23 of the Blofield booklet shows the site assessment conclusion and this site is shown to be unreasonable. The booklets tell the story of sites submitted and assessed. It would be inappropriate to remove reference to unreasonable sites.	No change
Site assessment booklet (Reepham)	Mr Hugh Ivins [14963]	23352	Object	Legal and soundness objection raised, and challenge compliance with duty to cooperate as Reepham assessment is flawed as REP1 and REP2 have applications/ permissions which don't accord with BDC site allocation document 2016 or proposed GNLP.	The application on REP1 has not been determined but proposes similar uses over two sites. The permission on REP2 is considered consistent with the site's allocation.	No change
KSC site assessment booklets (Hethersett)	Lanpro Services Ltd (Ms Hannah Smith) [16907]	23808	Object	Soundness objection raised and challenge to compliance with duty to cooperate in support of GNLP0480, which can provide site for SME builders. Rationale for not allocating site (level of growth needed in Hethersett) is unjustified. Site can offer long term protection to strategic gap. Strategy distributes growth	GNLP0480 is in the strategic gap, so development here would erode, not protect it. The distribution of growth is addressed through Policy 1 which allocates a proportionate level of growth to KSCs and supports the Cambridge-Norwich Tech Corridor. The proportion of growth in KSCs is considered appropriate to support services in	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				to villages and rural towns and away from Cambridge-Norwich Tech Corridor.	these centres serving rural hinterlands. Overall, 12% of the homes allocated are on sites of no larger than 1 ha, meeting national requirements.	
KSC site assessment booklets (Poringland)	Glavenhill Limited [19394]	23823	Object	Unsound not to allocate housing in Poringland, partly due to dispersal strategy. Commitment has reduced as housing delivered in the village. GNLP0494R is suitable, available, deliverable. Site access given as constraint, but access was not disputed by Highways Authority in recent application 2017/2871	Commitment reflects position at GNLP base date. Poringland has grown significantly in recent years and services need to adjust capacity. The narrow access restricts the site's potential, including likely impact on properties adjacent to the dwelling proposed for demolition.	No change
KSC site assessment booklets (Poringland)	Glavenhill Limited [19394]	23878	Object	Unsound not to allocate GNLP0485R, failed to consider school and community facilities, while pressing need for school and GI exists. Highway Authority concerns demonstrated to be unjustified, have not considered evidence submitted Reg18C. Unsound not to allocate housing in Poringland, partly due to dispersal strategy. Commitment has reduced as housing delivered in the village.	The site is considered unsuitable for a school or housing, as the Highway Authority state that the site access and local highway network make the site unsuitable. Commitment reflects position at GNLP base date. Poringland has grown significantly in recent years and services need to adjust capacity.	No change
KSC site assessment booklets (Hingham) (Rep 3)	Hingham Town Council (Mrs A Doe, Clerk) [12974]	24260	Object	Legal and soundness objection raised and challenge compliance with duty to co-operate as there are contradictions in site assessments, decisions on some sites are flawed, not based on proportionate evidence. GNLP0298 and GNLP0335 offer community woodland, GNLP0395 could improve infrastructure. Decision to allocate GNLP0520 and GNLP0503 is flawed. Highway Authority evidence is disputed, mitigation afforded to allocated sites could be applied to other sites. No reference to town centre. Conclusion justifies predetermined decision as it refers to 'in addition to' 0520 rather than replacing the site with 0298.	Officers from Development Management, Highways Authority, the Lead Local Flood Authority and Children's Services were involved in the site assessment process. The Highway Authority view is that highway issues for GNLP0298 cannot be mitigated, unlike sites preferred by Hingham TC. All evidence submitted has been considered. The HELAA assessment is a component of the wider process. Having preferred a site at Reg18C, unless new evidence shows the site to be unsuitable, a challenge would be likely if the site was swapped for an alternative.	No change
KSC site assessment booklets (Loddon)	Pegasus Group (Mr Robert Barber) [19984]	24554	Object	Sites (GNLP4029) adjacent to allocated site would be natural extension to Loddon. Commissioned evidence contradicts Highway Authority, Lead Local Flood Authority and Development Management views.	Officers from Development Management, Highways Authority, the Lead Local Flood Authority and Children's Services were involved in the site assessment process. The commissioned evidence you refer to was not submitted with the Reg19 representation.	No change

Broadland Village Clusters (chapters and site assessment booklets)

Blofield Heath and Hemblington

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy 1048R	Lanpro Services Ltd (Ian Douglass) [12984]	24131	Object	<p>Soundness objection to the allocation of GNLP1048R.</p> <p>Site GNLP2080 should be allocated instead. It is sustainably located and deliverable. Part of the site has permission, which provides for a new section of footpath and access improvements to overcome concerns identified.</p> <p>No evidence that GNLP1048R can deliver in reasonable time, whereas deliverability of GNLP2080 has been demonstrated.</p>	<p>The process of site selection is set out in the assessment booklet for the Blofield Heath cluster which concludes that site GNLP1048R is the most suitable site for allocation. Site GNLP2080 continues to be unreasonable.</p> <p>The promoters of site GNLP1048R have signed a Statement of Common Ground to confirm the deliverability of the site.</p>	No change
Policy 1048R	Savills (Lydia Voyias) [16956]	24489	Object	<p>Support for the allocation of GNLP1048R. Statement of Common Ground submitted. Evidence provided to demonstrate that more than 20 dwellings could be accommodated.</p> <p>Soundness objection to policy criteria relating to grass snakes. Suggest this is replaced by alternative wording requiring a Preliminary Ecological Appraisal and appropriate mitigation having regard to site surveys.</p>	<p>Support for the allocation is noted. 20 dwellings is considered an appropriate number for the cluster so additional dwellings are not needed.</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however if the Inspector is minded to make a change to modify policy requirement number 4 to remove specific reference to grass snakes and replace with a more general requirement for an ecological appraisal then the GN authorities have no objection to this.</p>	<p>No change.</p> <p>If the Inspector is minded to make a change to delete policy requirement 4 and insert a more general requirement to read 'A preliminary ecological appraisal will be required with mitigation measures implemented as appropriate having regard to site surveys', then the GN authorities have no objection in principle to this.</p>
Policy BLO5	Anglian Water Services Ltd (Stewart Patience) [12528]	23860	Object	<p>Soundness objection raised as there is an existing foul sewer within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required.</p> <p>Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.</p>	<p>No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.</p>	<p>Make the following minor modification to add additional wording to the supporting text at the end of paragraph 6.8 for clarity:</p> <p>'There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance'.</p>

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy 0297	Anglian Water Services Ltd (Stewart Patience) [12528]	23861	Object	<p>Soundness objection raised as there is an existing rising main (pressurised sewer) within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required.</p> <p>Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.</p>	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.	<p>Make the following minor modification to add additional wording to the supporting text at the end of paragraph 6.14 for clarity:</p> <p>'There is an existing rising main (pressurised sewer) in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding access for maintenance'.</p>
Policy 0297	Savills (Lydia Voyias) [16956]	24383 24511	Support Object	<p>One representation in support of the allocation (accompanied by Statement of Common Ground and other evidence documents)</p> <p>A second representation objecting to the policy on soundness grounds. Specific suggestions are proposed to policy wording, particularly draft criteria 6 regarding the need for phasing in line with upgrades to Aylsham Water Recycling Centre. Clarity needed on whether this is necessary based on information in the Water Cycle Study.</p>	<p>Support for the allocation is noted.</p> <p>The policy as written is considered to be sound however if the Inspector is minded to make a change to policy requirement number 6 following clarification of evidence in relation to the Water Cycle Study as a Proposed Modification then the GN authorities have no objection to this.</p>	<p>No change</p> <p>If the Inspector is minded to make a change to policy requirement number 6 following clarification of evidence in the Water Cycle Study, then the GN authorities have no objection in principle to this.</p>

Cantley

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Broads Authority (Natalie Beal) [12415]	23376	Support	<p>General support for the plan. Some comments raised which are not considered to be soundness issues:</p> <p>Cantley map, page 15 – show the Broads for consistency and context.</p>	<p>Support noted</p> <p>The Broads Authority area is missing from the Cantley settlement map. The GNLP authorities accept that a minor modification could be made to correct this error.</p>	<p>Make a minor modification to correct error and add the Broads Authority area to the Cantley settlement map</p>

Coltishall, Horsford with Stanninghall and Belaugh

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.26 Para 6.27 Para 6.28 Para 6.30	Mr John Shirley [18795]	23482 23483 23484 23485	Object	Various objections raised in relation to soundness, legal compliance and duty to cooperate including: - No school expansion without addressing road issues - Need to look at traffic data since NDR was opened - Need to conduct an accurate HELAA exercise - Need to correct data on services and facilities in the village - Landscape impact underestimated - Surface water drainage issues - Take account of windfall since 2018.	The process of site selection is set out in the assessment booklet for the Coltishall cluster which concludes that site GNLP2019 is the most suitable site for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process. Planning permissions granted since 2018 are counted as windfall in addition to allocated sites.	No change
Para 6.26	Coltishall Primary School (Colin Dean, Chair of Governors) [19902]	23552	Object	Reference to school expansion should be removed from the plan. In practical terms this is not possible without doubling the size of the school and there is insufficient demand for this even with the additional housing.	The information regarding school capacity and ability to expand was sourced from Children's Services. The reference to the expansion of Coltishall Primary is factual as the site is not landlocked and could be expanded.	No change
Para 6.30 Settlement Map	Broads Authority (Natalie Beal) [12415]	23380 23377	Support	General support for the plan. Some comments raised which are not considered to be soundness issues: Coltishall, Horstead and Belaugh – should the Conservation Areas that cover parts of all three villages be mentioned in the text? Horstead and Coltishall map, page 25 – show the Broads for consistency and context.	Support noted Conservation Areas are not routinely mentioned in the introductory text to other Broadland villages so no change is considered necessary. The Conservation Area is mentioned in policy COL2 as there is a direct relationship to the site which needs to be taken into account. The Broads Authority area is missing from the Coltishall settlement map. The GNLP authorities accept that a minor modification could be made to correct this error.	No change No change Make a minor modification to correct error and add the Broads Authority area to the Coltishall settlement map
Settlement Map	DJ Designs Ltd (Mr M J S Marshall) [19792]	23256	Object	Soundness objection raised to non allocation of GNLP4048. Site rejected on highway grounds but further details provided as part of recently refused planning application which overcame highway objection.	The process of site selection is set out in the assessment booklet for the Coltishall cluster which concludes that site GNLP2019 is	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					the most suitable site for allocation. Site GNLP4048 continues to be unreasonable. Highways officers were involved in the site assessment process.	
Para 6.31 Para 6.32 Policy 2019 map Site assessment booklet Allocated Sites Tables	Mr John Shirley [18795]	23402 23403 23404 23533 23534	Object	Various objections raised in relation to soundness, legal compliance and duty to cooperate including: - Pending application (ref 20201627) shows potential significant negative surface water drainage effects on nearby properties. Fails against NPPF requirements. - Objections from previous stages of consultation have been ignored. - HELAA is inaccurate particularly in terms of access to services, flood risk, utilities, transport and roads and compatibility with neighbours - Applications granted since 2018 should be deducted from the requirement. - School cannot be extended without addressing serious traffic issues on Rectory Road	The process of site selection is set out in the assessment booklet for the Coltishall cluster which concludes that site GNLP2019 is the most suitable site for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process. Planning permissions granted since 2018 are counted as windfall in addition to allocated sites.	No change
Policy 2019 Policy COL1 Policy COL2	Coltishall Parish Council (Rebecca Furr, Parish Clerk) [14396]	24164 24165 24539	Object	Objections raised to the plan on soundness grounds: - Contrary to NPPF principles of sustainable development, conserving and enhancing the natural environment, sustainable transport and climate change - Objections to COL1/GNLP2019 due to it being a greenfield site with high levels of biodiversity, pedestrian safety and safety concerns with the B1150/Rectory Road junction - Objections to COL2 due to high traffic levels. Not a healthy location for housing and no footpath to the high street - All allocations will be highly car dependent and add to existing traffic problems - Recent permissions should be deducted from the houses expected for Coltishall.	The process of site selection is set out in the assessment booklet for the Coltishall cluster which concludes that site GNLP2019 is the most suitable site for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process. Planning permissions granted since 2018 are counted as windfall in addition to allocated sites. Undeveloped allocations from the Broadland Local Plan have been carried forward into the GNLP as the principle of development on these sites has already been accepted	No change
Policy COL2	Historic England (Debbie Mack) [19652]	24042	Support	Welcome the addition of criterion 4 to reference the nearby listed limekiln and conservation area.	Support noted	No change

Foulsham and Themelthorpe

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.35 Para 6.36 Settlement Map Para 6.37 Para 6.38 Policy 0605 Policy 0605 Map	Mr Richard Stilgoe [16179] Mrs Sharon Stilgoe [15688]	23539 23548 23540 23574 23542 23541 23549 23550 23545 23546 23764 23547	Object	Various objections raised in relation to soundness, legal compliance and duty to cooperate including: - Misleading references about the ability of the school to expand - Recent planning permission on brownfield site within development boundary should be taken into account and site GNLP0605 removed as an allocation - Historically important hedgerow bordering site not taken into account - Landowner does not control access to the site. Access from Aubrey Rix Close not suitable - Site is located outside development boundary - Environmental protection and landscape intrusion not considered, no mention of conservation area - No safe route to school due to volume of traffic, lack of raised pavements, bottle neck junction and busy high street with parked cars - Will lead to further development on surrounding fields	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process. The promoters of site GNLP0605 have signed a Statement of Common Ground to confirm the deliverability of the site. Planning permissions granted since 2018 are counted as windfall in addition to allocated sites.	No change
Para 6.35 Para 6.36 Para 6.37 Settlement Map	Ms Claire Morgan [19121]	23562 23564 23565 23567	Object	Various objections raised in relation to soundness and duty to cooperate objections including: - Traffic congestion - Flooding and contamination - Highway safety, vehicles do not adhere to 20mph limit - Environmental impact due to fumes, hard surfaces, buildings and displacement of wildlife	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Para 6.35 Para 6.36 Para 6.37 Settlement Map Para 6.38 Policy 0605 Policy 0605 map	Mr Richard Lindley [19471] Miss Kate Scarfe [19118]	23581 23762 23580 23763 23582 23465 23583 23766 23586 23759 23587 23757 23588 23755 23765	Object	Various objections raised in relation to soundness, legal compliance and duty to cooperate including: - School not easily expanded - High Street already congested - Pedestrian safety – no safe route to school - Impact of construction traffic - Limited employment opportunities - Poor transport connections – car dependency - Overburdening poor village infrastructure - Recent approval on brownfield site within the village boundary not taken into account - Destruction of wildlife corridor - Potential historically significant hedgerow - Call for sites has false statements and no benefits - Owner does not own access to the site	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process. The promoters of site GNLP0605 have signed a Statement of Common Ground to confirm the deliverability of the site.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<ul style="list-style-type: none"> - Aubrey Rix Close not suitable for access - No mention of conservation area and wildlife - Outside development boundary 	Planning permissions granted since 2018 are counted as windfall in addition to allocated sites.	
Para 6.35	Miss Rebecca Tilley [19946]	23774	Object	Objections in relation to soundness and duty to cooperate. No future development due to lack of amenities, position of the site, lack of employment in the village and the unrealistic view to expand the school.	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Children's Services were involved in the site assessment process.	No change
Para 6.36	Mrs Rachel Pattison [19943]	23721	Object	Aubrey Rix Close is already a bottleneck for cars. This development would add to the problem.	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process.	No change
Para 6.36 Settlement Map Para 6.38 Policy 0605 Policy 0605 Map	Foulsham Parish Council (Mike Smith, Clerk) [15066]	23820 23719 23538 23720 23819	Object	<p>Various objections raised in relation to soundness, legal compliance and duty to cooperate including:</p> <ul style="list-style-type: none"> - Recent approval on brownfield site within the village boundary not taken into account – no need to develop GNLP0605 - Outside settlement boundary - Ancient hedgerow would need to be removed to gain access - Traffic concerns - Pedestrian safety - Car dependency - Proposed access to site is not suitable - More suitable sites in the village for a similar size development 	<p>The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Children's Services were involved in the site assessment process.</p> <p>The promoters of site GNLP0605 have signed a Statement of Common Ground to confirm the deliverability of the site.</p> <p>Planning permissions granted since 2018 are counted as windfall in addition to allocated sites.</p>	No change
Para 6.36	Mr Michael Smith [19961]	23886	Object	<p>Various objections raised in relation to soundness, legal compliance and duty to cooperate including:</p> <ul style="list-style-type: none"> - Traffic pressure - Pedestrian safety - Ancient hedgerow 	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				<ul style="list-style-type: none"> - Recent permission on GNLP0275 not taken into account - Foulsham has limited amenities, employment opportunities and no bus service. 	<p>Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.</p> <p>The promoters of site GNLP0605 have signed a Statement of Common Ground to confirm the deliverability of the site.</p> <p>Planning permissions granted since 2018 are counted as windfall in addition to allocated sites.</p>	
Para 6.37	Mr Simon Kempson [16363]	23423	Object	Objections in relation to soundness, legal compliance and duty to cooperate. Very poor access to the proposed housing allocation, danger to children and cyclists. Will also destroy the wildlife corridor backing onto Foundry Close.	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Para 6.37	Mrs Candida Roberston [19203]	23718	Object	<p>Various objections raised in relation to soundness, legal compliance and duty to cooperate including:</p> <ul style="list-style-type: none"> - Poor access - Speeding vehicles - Residential parking and access to private parking - Infrastructure not suitable for increase in traffic 	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Settlement Map	Mr Stuart Smith [19371]	23327	Object	Objections in relation to soundness and duty to cooperate. Development will not stop at a small number of homes, the village will continue to expand which will totally ruin it. There is not a 'number' of facilities as suggested, access to the site is not safe	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Mr Adrian Pohajdak [16384]	23767	Object	Objections in relation to soundness and duty to cooperate. Proposed access not safe, road is small, many parked cars	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Settlement Map	Mrs Lisa Meecham [19990]	24243	Object	Objections in relation to soundness, legal compliance and duty to cooperate. Not safe	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Para 6.38	Mr Timothy Metford-Sewell [19817]	23299	Object	Soundness concerns raised regarding traffic flow, lack of raised pathways, pedestrian safety and destruction of The Green by heavy machinery	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process.	No change
Policy 0605	Mrs Emily White [19816]	23298	Object	Objections in relation to soundness, legal compliance and duty to cooperate. Aubrey Rix and Stringer Lane already congested with traffic, fear for safety of children that live in the close. Not allowed to have gates or fences around our front gardens.	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process.	No change
Policy 0605	Mrs Jessica Davis [19884]	23474	Object	Soundness concern raised objecting to access being via Stringers Lane.	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy 0605	Historic England (Debbie Mack) [19652]	24043	Support	Welcome the addition of criterion 2 to reference the nearby listed buildings and conservation area	Support noted	No change
Policy 0605 Map	Mrs Gill Hannant [19116]	23297	Object	Objections in relation to soundness and duty to cooperate. Stringers Lane and Aubrey Rix access roads are not suitable for the volume of traffic proposed. Two cars can only pass each other if there are no cars parked and use the footpath. Safety concern for families with children.	The process of site selection is set out in the assessment booklet for the Foulsham cluster which concludes that site GNLP0605 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process.	No change
Policy FOU2	Anglian Water Services Ltd (Stewart Patience) [12528]	23863	Object	<p>Soundness objection raised as there is an existing rising main (pressurised sewer) within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required.</p> <p>Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.</p>	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.	<p>Make the following minor modification to add additional wording to the supporting text at the end of paragraph 6.37 for clarity.</p> <p>'There is an existing rising main (pressurised sewer) in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding access for maintenance'.</p>
Policy FOU2	Historic England (Debbie Mack) [19652]	24044	Support	Welcome the addition of criterion 6 to reference the nearby conservation area	Support noted	No change.

Freethorpe, Halvergate and Wickhampton

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Freethorpe Parish Council (Andrew Moll, Clerk) [14266]	23465	Support	The Parish Council discussed the current consultation at its meeting on 15 February 2021 and agreed a response that the process has been sound.	Support noted	No change
Policy FRE1	Historic England (Debbie Mack) [19652]	24045	Support	Welcome the addition of criterion 4 to reference the nearby listed buildings and requirement for landscaping along the northern boundary	Support noted	No change

Great and Little Plumstead

Policy/Map/Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.52 Site Assessment Booklet	Lanpro Services Ltd (Hannah Smith) [16907] on behalf of Glavenhill Limited [19394]	23815 23816	Object	Soundness objection to the strategy for Great and Little Plumstead, is not 'positively prepared', 'justified' or 'effective' in delivering the houses needed within the village over the plan period under policy 7.4. Comments relate particularly to the non allocation of site GNLP0483R. The site is a suitable, available and deliverable option for small scale SME housing with no highway objections and protection of open countryside to the west. The site has received good interest from local house builders.	The process of site selection is set out in the assessment booklet for the Great and Little Plumstead cluster which outlines the reasons for the decision not to allocate any sites in the cluster. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Settlement Map	Mr Gary Collier [18801]	23460	Object	Objections in relation to soundness, legal compliance and duty to cooperate. The plan is unsound as it does not include any allocations at Great and Little Plumstead. No opportunity for the community to expand and grow. Site GNLP3014R is the best option put forward and can provide many benefits.	The process of site selection is set out in the assessment booklet for the Great and Little Plumstead cluster which outlines the reasons for the decision not to allocate any sites in the cluster. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Settlement Map	Le Ronde Wright (Lewis Matthews) [16578]	24341	Object	Soundness objection, see Policy 7.4 for more detailed representation regarding employment issues. An allocation of a small extension to the existing Octagon Business Park (GNLP2107) would provide opportunities for local residents and future employers.	See Policy 7.4 for more detailed response regarding employment issues. It is considered that a proposal such as GNLP2017 would be better dealt with through the planning application process.	No change

Great Witchingham, Lenwade, Weston Longville, Attlebridge, Little Witchingham and Morton on the Hill

Policy/Map/Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Maddox Planning (Dylan Kerai) [19893] on behalf of Weston Hall Estate [19896]	23532	Object	Soundness objection raised. The settlement boundary should be extended to include all the existing built up area of the village and land at Weston Hall (GNLP0553) to promote sustainable development in rural areas. Only providing 20 new homes in Lenwade is not consistent with national policy where it states that villages should have the opportunity to grow and thrive especially where this will support local services.	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries were excluded because of this, however they could be made through neighbourhood	No change

					plans or a future review of the local plan. The provision of 20 new homes in the cluster is considered to be appropriate within the context of Policy 7.4 Site GNLP0553 was considered to be unreasonable for the reasons given in the Great Witchingham/Lenwade site assessment booklet.	
Policy 0608R	Norfolk Wildlife Trust (Mike Jones) [17875]	23895	Object	Soundness objection due to proximity to Lenwade Pits West CWS. Recommend site policy is updated in line with other proposed allocations in proximity to CWS with a reference to the need for an ecological assessment as part of any application.	At Regulation 18C the policy did contain reference to the need to provide a buffer between the development and the County Wildlife Site which was removed at Regulation 19 when the boundary of the site was reduced. The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however if the inspector is minded to make a change by including an additional policy requirement for an ecological assessment to be carried out as part of any planning application recognising the proximity of the allocation to a County Wildlife site as a Proposed Modification then the GN authorities have no objection to this	No change If the Inspector is minded to make a change to insert a new policy requirement to read 'A preliminary ecological assessment will be required as part of any planning application recognising the proximity of the site to the Lenwade Pits West County Wildlife Site' as a Proposed Modification, then the GN authorities have no objection in principle to this.
Policy 0608R	Historic England (Debbie Mack) [19652]	24046	Support	Welcome the reference to the listed building at criterion 3.	Support noted	No change

Hainford and Stratton Strawless

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Hainford Parish Council (Mr J Graves, Clerk) [13286]	23926	Object	The proposal to cluster Hainford with Stratton Strawless is considered unsound. Hainford should remain as a standalone village as there is no evidence to prove that it should be clustered with any other village	A consistent approach has been taken to the identification of village clusters based on primary school catchments. This approach leads to Hainford being clustered with Stratton Strawless	No change

Horsford, Felthorpe and Haveringland

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Settlement Map	Savills (Jonathan Dixon) [12969]	24199	Object	The HELAA assessment is factually incorrect and there is no evidence or justification for the non allocation of site GNLP2160. The plan is not sound as it has not been positively prepared, is not justified, will not be effective and is not consistent with national policy.	The process of site selection is set out in the assessment booklet for the Horsford cluster which concludes that site GNLP0264 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process.	No change
Settlement Map	Sequence (UK) Ltd (Graham Bloomfield)	24252	Object	The property Firbank has recently been acquired through probate and therefore no previous representations have been made to the GNLP. The Horsford proposals map demonstrates an inconsistent approach to the inclusion of land within the settlement boundary. Land east of Mill Road benefits from various permissions and has been significantly constructed and should have been included in the settlement boundary. This failure raises a soundness objection as the plan is already out of date and is not an appropriate strategy. There are examples of inconsistencies throughout the plan	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries were excluded because of this, however amendments to boundaries could be made through neighbourhood plans or a future review of the local plan.	No change.
Settlement Map Site Assessment Booklet	Howes Percival (Jamie Childs) [20003]	24396 24395	Object	Objects to the failure to allocate GNLP0283 or GNLP0283R on soundness grounds. Horsford should be considered for greater additional housing growth than 20-50 new homes. Conclusions on site in the assessment booklet are unsubstantiated and do not withstand scrutiny.	The process of site selection is set out in the assessment booklet for the Horsford cluster which concludes that site GNLP0264 is the most suitable site for allocation. Officers from Development Management, Highways, Flood and Childrens Services were involved in the site assessment process. The figure of 20-50 new homes is considered to be appropriate for the Horsford cluster bearing in mind the capacity of the primary school and the level of recent development that has taken place.	No change
Policy 0264	Mr Dave Thomas [19770]	23235	Object	Objection in relation to soundness and duty to cooperate. This area has recently experienced severe flooding for the first time. An investigation is pending with NCC about the cause so it would be unwise for there to be any further development in the area.	The Lead Local Flood Authority did not raise any objections to the allocation through the site assessment process. Any	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					additional information arising from the NCC investigations could be reported at the examination if necessary.	
Policy 0264	Miss Sarah Dugdell [19221]	23236	Object	Soundness objection raised. This land should not be developed for housing. Recent flooding needs to be addressed and the junction at Horsebeck Way already sees a high volume of traffic at peak times.	The Lead Local Flood Authority did not raise any objections to the allocation through the site assessment process. Any additional information arising from the NCC investigations could be reported at the examination if necessary.	No change
Policy 0264	Mark Hindle [19939]	23709	Object	The allocation of site GNLP0264 is considered unsound because it will leave adjacent land locked and unsuitable for any future use. This portion of land should be incorporated into the allocation.	The adjacent land was not put forward for consideration prior to Regulation 19 and has therefore not been assessed as part of the proposal or subject to any sustainability appraisal. The allocation is not considered to be unsound without the inclusion of this land	No change
Policy 0264	Anglian Water Services Ltd (Stewart Patience) [12528]	23872	Object	<p>Soundness objection raised as there are existing foul and surface water sewers within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required.</p> <p>Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure'.</p>	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.	<p>Make the following minor modification to add additional wording to the supporting text at the end of paragraph 6.68 for clarity:</p> <p>'There are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site. These should be taken into account in the design of the development including safeguarding suitable access for maintenance'.</p>
Policy 0264	Lindy Platten-Jarvis [18674]	24425	Object	Objections in relation to soundness and duty to cooperate. Site GNLP0264 will generate more traffic on local Felthorpe roads which are already dangerous.	The process of site selection is set out in the assessment booklet for the Horsford and Felthorpe cluster which concludes that site GNLP0264 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process.	No change
Site Assessment booklet	Mr Shaun Powley [19764]	23234	Object	Objection on soundness grounds. Properties on Dog Lane and Coltsfoot Road in Horsford recently flooded as result of increased pressure on nearby Beck from the NDR. New housing will increase	The Lead Local Flood Authority did not raise any objections to the allocation through the site assessment process. Any	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				the flood risk further. NCC are investigating so findings should be considered before allocation can be considered sound.	additional information arising from the NCC investigations could be reported at the examination if necessary.	

Horsham and Newton St Faith

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.71	Cllr Dan Roper [15738]	23584	Object	Objections in relation to soundness and duty to cooperate. GNLP0125R has not been subject to Reg 18 consultation in its current proposal and consultation on smaller propose had significant local opposition. Figures do not account for housing that has been delivered and sufficient growth can be achieved through infill. GNLP0125R would have significant constraints re safe access and is unsuitable.	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 to be changes. Changes may be made because sites have only recently become available, to reflect additional evidence or to better meet needs. Plan preparation would be rendered very inflexible if all such changes required further regulation 18 consultation.	No change
Settlement Map	Mrs Georgina Brotherton [19554]	23409	Object	Soundness and legal compliance objections raised to the inconsistent approach to settlement boundaries across the GNLP. The settlement boundary for Horsham St Faith should be amended to include the proposed employment allocation GNLP0125R/4061/HNF3, the western bund and Block L.	Following publication of the Government's White Paper on the future of planning a decision was taken that the GNLP should focus on identifying strategic policies and sufficient sites to meet strategic housing needs. Changes to settlement boundaries were excluded because of this, however amendments to boundaries could be made through neighbourhood plans or a future review of the local plan.	No change
Settlement Map	Mr Jon Jennings [19303]	24112	Object	Soundness objections raised in relation to site GNLP1054. The rejection of the site has not been justified and is based on out of date information and incorrect assumptions. It needs to be properly assessed and the scorings revised and a detailed justification made as to why GNLP0125R is considered to be the optimum site despite the constraints.	The process of site selection is set out in the assessment booklet for the Horsford cluster which concludes that site GNLP0125R is the most suitable site for allocation. Officers from Development Management.	No change.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					Highways, Flood and Childrens Services were involved in the site assessment process. Site GNLP1054 continues to be unreasonable.	
Policy 0125R	Mrs Aileen Hughes [18890]	23233	Object	Soundness objection raised. The infrastructure of St Faiths is already under pressure. Building further homes will make the area feel more of a suburb to Norwich than a separate village. Building here would result in further expansion.	The process of site selection is set out in the assessment booklet for the Horsham St Faith cluster which concludes that site GNLP0125R is the most suitable site for allocation.	No change
Policy 0125R	Horsham and Newton St Faith Parish Council (Mr J Graves, Clerk) [13288]	23245	Object	Objections in relation to soundness and duty to cooperate. The allocation has been raised to 50 without consultation with the parish council. Additional dwellings could be accommodated on infill sites within the settlement boundary.	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 to be changes. Changes may be made because sites have only recently become available, to reflect additional evidence or to better meet needs. Plan preparation would be rendered very inflexible if all such changes required further regulation 18 consultation.	No change
Policy 0125R	Historic England (Debbie Mack) [19652]	24047	Object	Soundness objection raised as this is a sensitive site in terms of potential impact upon multiple heritage assets, some of which are highly graded. Welcome the reference to the church, scheduled Priory and conservation area but continue to suggest that a more detailed Heritage Impact Assessment should be undertaken in advance of the EIP and the findings should inform the policy wording.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 6.73 and policy criteria 4 which requires the conservation and enhancement of the significance of the heritage assets and the submission of a Heritage Impact Assessment as part of any planning application.	No change.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy 0125R	Bidwells (Iain Hill) [16273]	24096	Object	Strong support for the allocation of GNLP0125R but minor alterations sought to the policy wording to ensure its soundness in relation to access and footways.	<p>Support noted</p> <p>Post Regulation 19 discussions with Highway colleagues have confirmed that the requirement for two points of vehicular access is an error so the GNLP authorities accept that a minor modification could be made to remove policy requirement 3.</p> <p>With regard to the suggested wording change to policy requirement 1 the policy as worded is considered to be sound and therefore it is not necessary to make the change suggested. However Highways colleagues have indicated that they would be happy to accept the amended wording in relation to policy requirement 1 so the GNLP authorities would not object to a proposed modification being put forward by the inspector to reflect this.</p>	<p>Make a minor modification to remove policy requirement 3 which was added in error and renumber policy accordingly.</p> <p>If the Inspector is minded to make a change to policy requirement 1 as a Proposed Modification, then the GN authorities have no objection in principle to this. The change could read as follows: ‘Provision of frontage footways and carriageway widening unless it can be demonstrated it is not practical or feasible’.</p>
Policy 0125R	Mr Jon Jennings [19303]	24111	Object	Soundness objection raised relating to inconsistencies between the wording of the policy and the supporting text. No justification to support why the allocation has been raised from 20-30 dwellings at Reg 18 to 50+ at Reg 19. This development will represent an uncontrolled expansion into open countryside with no regard for the need to provide landscaping. Other sites would have less impact on townscape and landscape. E.g. GNLP1054	<p>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 to be changes. Changes may be made because sites have only recently become available, to reflect additional evidence or to better meet needs. Plan preparation would be rendered very inflexible if all such changes required further regulation 18 consultation.</p>	No change
Policy HNF1	Anglian Water Services Ltd (Stewart)	23874	Object	Soundness objection raised as there is an existing foul sewer within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required.	<p>No changes are required for soundness, however the GNLP authorities accept that a minor</p>	<p>Make the following minor modification to add additional wording to the supporting text at</p>

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Patience) [12528]			Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.	modification could be made for clarity.	the end of paragraph 6.74 for clarity: 'There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance'.
Policy HNF1	Historic England (Debbie Mack) [19652]	24048	Support	Welcome the addition of criterion 6 to reference the nearby listed buildings and requirement for landscaping along the eastern boundary.	Support noted	No change
Para 6.75 Policy HNF2, 0466R	GP Planning Ltd (Maureen Darrie) [14933]	23657 23667	Support	Support subject to changing the allocation boundary to incorporate land originally safeguarded for the Broadland Northway	No amendments to the boundary of the carried forward allocation are proposed.	No change
Policy HNF2, 0466R	Mr Christopher Yardley [16025] Mrs Janet Hill [16030]	23708 24153	Object	Soundness objection raised. The omission of the wording from the Broadland Local Plan which states that only uses that have a significant benefit from being located near the airport shall be permitted is contrary to sustainability principles for an otherwise intrusive and inappropriately located industrial estate.	The relaxation in policy wording carried forward from the Broadland Local Plan to allow a full range of employment uses, including those benefitting from a location close to the airport was considered appropriate to assist in delivering development in this key strategic location close to the Broadland Northway. It is not proposed to make any changes to this approach.	No change
Policy SL2007, 4016, HNF3	Mrs Georgina Brotherton [19554]	23406	Object	Support the allocation of the site for employment uses but object to the proposed allocation area boundary on soundness and legal compliance grounds. Request revisions to include the western landscaping bund and remove the area known as Block L.	Support noted. The allocation boundary as drawn is considered to be sound so therefore it is not necessary to make the changes suggested, however as these are only minor in nature the GNLP authorities would not object to a proposed modification being put forward by the Inspector to include the western landscaping bund within the allocation and remove the area known as Block L which has already been developed.	No change If the Inspector is minded to make a change to include the western landscaping bund within the allocation and remove the area known as Block L as a Proposed Modification, then the GN authorities have no objection in principle to this. If a change were made then the policy map and the area shown in the policy would need to be updated accordingly.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy SL2007, 4016, HNF3	Norfolk Wildlife Trust (Mick Jones) [17875]	23898	Support	Support the inclusion of point 4 requiring assessment of potential indirect impacts on Horsham Meadows CWS as part of any application.	Support noted	No change
Policy SL2007, 4016, HNF3	Historic England (Debbie Mack) [19652]	24049	Support	Welcome the reference in relation to archaeology at bullet point 3. The site is separated from Horsham St Faith and its conservation area/listed buildings by the existing industrial estate nevertheless the area is of archaeological sensitivity given the proximity of the scheduled St Faith Priory.	Support noted	No change

Lingwood and Burlingham, Strumpshaw and Beighton

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.77 Para 6.78	Lingwood and Burlingham Parish Council (Sonya Dickinson, Clerk) [12965]	23639 23640	Object	<p>Objections on legal compliance, soundness and duty to cooperate grounds regarding school capacity and expansion, number of dwellings and infrastructure.</p> <p>Site GNLP 4016 should be removed from the plan as it was not consulted on at Reg 18 and the Parish Council has not been given the opportunity to consult or comment regarding its inclusion. The site is designated agricultural land outside the development boundary and will jeopardise the future expansion of the school. The site of the old school in Chapel Road should be allocated and not counted as windfall</p>	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 to be changes. Changes may be made because sites have only recently become available, to reflect additional evidence or to better meet needs. Plan preparation would be rendered very inflexible if all such changes required further regulation 18 consultation. Recent planning permissions are counted as windfall in addition to allocated sites.	No change
Settlement Map	Munnings Construction Limited (Phil Munnings) [19778]	24063	Object	Soundness objection relating to the non allocation of site GNLP4051. The reason for rejection should be changed to remove reference to there being no safe walking route to school as this can be incorporated into any future planning permission via pre commencement condition. Adjacent site GNLP0067 was granted permission on appeal.	The process of site selection is set out in the assessment booklet for the Lingwood cluster which concludes that sites GNLP0380 and GNLP4016 are the most suitable sites for allocation. Officers from Highways were involved in the site assessment process.	No change
Policy 0380	Miss Lindsay Balls [18887]	23227	Object	Objection on legal compliance, soundness and duty to cooperate grounds. Loss of habitat, ancient trees, dangerous site entrance, Flooding. Old school site should be included and if further housing is needed it should all be built at GNLP4016.	The process of site selection is set out in the assessment booklet for the Lingwood cluster which concludes that sites GNLP0380 and GNLP4016 are the most	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					<p>suitable sites for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.</p> <p>Planning permissions granted since 2018 such as the old school site are counted as windfall in addition to allocated sites.</p>	
Policy 0380	NPS Property Consultants Ltd (Andy Scales) [14146]	23699	Support	Norfolk County Council, as landowner supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable and deliverable for development in the early part of the plan period.	Support noted	No change
Policy 4016	Miss Lindsay Balls [18887]	23416	Support	This road already has the infrastructure to cope with new houses. No blind bends to the road and pavements already in place. A much safer place to build new houses and closer to the school and village hall.	Support noted	No change
Policy 4016	NPS Property Consultants Ltd (Andy Scales) [14146]	23700	Support	Norfolk County Council, as landowner supports this allocation and has submitted a Statement of Common Ground that explains that the site is available, suitable and deliverable for development in the early part of the plan period.	Support noted	No change

Marsham

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy 2143	Carter Jonas LLP (Bryan Flynn) [12669]	23566 23568	Object	Objection to the allocation of GNLP2143 on soundness grounds. It is a greenfield site and would have a significant impact on heritage assets and landscape character. An alternative site is available at Fengate Farm (GNLP3035) containing vacant and un used buildings with no significant constraints to development and a suitable vehicular access onto Old Norwich Road. A safe route to school is available from the site that avoids the use of the carriageway. A number of background evidence documents have been submitted	The process of site selection is set out in the assessment booklet for the Marsham cluster which concludes that site GNLP2143 is the most suitable site for allocation. Officers from Highways were involved in the site assessment process and subsequent discussions regarding this site.	No change
Policy 2143	Historic England (Debbie Mack) [19652]	24050	Object	Objection on soundness grounds. No designated assets within the site boundary but a number in close proximity. We welcome the wording at criterion 3 but this is a sensitive site in terms of potential impact upon multiple heritage assets some of which are highly graded and there are some concerns about the allocation of the site. Continue to suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP . If the site is found suitable the findings of the HIA	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any	No change

				should inform the policy wording. A concept diagram may also be helpful to show where open space and landscaping would be located.	development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 6.87 and policy criteria 3 which requires the conservation and enhancement of the significance of the heritage assets and the submission of a Heritage Impact Assessment as part of any planning application.	
Policy 2143	Bidwells (Darren Cogman) [12857]	24342	Support	Support for the allocation which is capable of delivering the quantum of development proposed. The site is available, suitable and viable.	Support noted	No change

Reedham

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.93	Mr John Cockburn [18983]	23439	Object	Objection on soundness and legal compliance grounds. Current road infrastructure is not considered to be suitable for additional traffic, access to doctors limited, poor sewage system, poor bus and train service.	The process of site selection is set out in the assessment booklet for the Reedham cluster which concludes that sites GNLP1001 and GNLP3003 are the most suitable for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.	No change
Settlement Map	Reedham Parish Council (Claudia Dickinson, Clerk) [12966]	23824	Object	Objection on soundness and legal compliance grounds. Neither site proposed has safe access to school. There should be consistency in allocating sites, if they do not meet the criteria set out in the policy they should not be included.	The process of site selection is set out in the assessment booklet for the Reedham cluster which concludes that sites GNLP1001 and GNLP3003 are the most suitable for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.	No change
Policy 1001	Badger Building (Edward Gilder) [17660]	23241	Support	Support	Support noted	No change
Policy 1001	Broads Authority (Natalie Beal) [12415]	23379	Support	General support for the plan. Some comments raised which are not considered to be soundness issues: The mention of setting of the Broads is welcomed but please add reference to protecting dark skies.	Support noted. We consider the policy is sound. However, if the Inspector is minded to make a change to the policy in this regard, BP4 could	No change, but if the Inspector is minded to make a change to the policy BP 4 could be amended to "Potential impact of the scheme on the Broads

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					be amended to include reference to dark skies. As a Proposed Modification, the GN authorities have no objection to this	Authority Executive Area, including any impact on dark skies , to be considered..." as a Proposed Modification.
Policy 3003	Magnus Magnusson [14502]	23248	Support	Support for the allocation of site GNLP3003. It is suitable, available and achievable. Additional land under the same ownership is also available.	Support noted. Additional land in Reedham is not required at the current time	No change
Policy 3003	Historic England (Debbie Mack) [19652]	24051	Support	Welcome the reference to the non designated heritage asset.	Support noted	No change.
Assessment Booklet and Unallocated Sites Table	One Planning (Heather Byrne) [19641]	23944 23945	Object	Soundness objection raised to the non allocation of site GNLP4025. Significant constraints with the sites chosen for allocation in Reedham. Evidence submitted to show how site GNLP4025 could provide a safe walking route to school and highway improvements. Site could accommodate approx. 12 dwellings although a much larger parcel of land is owned which could meet the housing needs of the village.	The process of site selection is set out in the assessment booklet for the Reedham cluster which concludes that sites GNLP1001 and GNLP3003 are the most suitable for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.	No change

Salhouse, Woodbastwick and Ranworth

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Para 6.100	Broads Authority (Natalie Beal) [12415]	23381	Support	General support for the plan. Some comments raised which are not considered to be soundness issues: Should the Conservation Area be mentioned? Potential for limited impact of the wider setting of the Conservation Area at the site allocated in Salhouse	Support noted. The policy as written is considered to be sound. Historic England have suggested a number of changes to policies throughout the plan where they felt that the impact on listed buildings and conservation areas was important and this site was not one of them.	No change.
Settlement Map	Mr Jon Jennings [19303]	24193	Object	Soundness objection to the non allocation of site GNLP0487 for care home, dwellings for the over 55's and GI. Questions over the accuracy of the HELAA assessment	Site GNLP0487 is not considered appropriate for allocation as a care home as it would be contrary to form and character and disconnected from the edge of the village with an absence of footpaths. At a strategic level there is not considered to be an	No change

					overriding need for extra care housing in Salhouse so more sustainable locations are favoured. The Neighbourhood Plan contains a policy relating to the provision of sheltered housing within the village and it is considered that this scheme may be better to come forward as a planning application to be considered against the Neighbourhood Plan.	
Policy 0188	Mr James Watts [14055]	23722	Object	Soundness objection raised as this site has significant drainage issues, loss of landscape view for residents of Norwich Road, access concerns and the need for biodiversity assessment	The process of site selection is set out in the assessment booklet for the Salhouse cluster which concludes that site GNLP0188 is the most suitable site for allocation. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process	No change
Policy 0188	Anglian Water Services Ltd (Stewart Patience) [12528]	23875	Object	Soundness objection raised as there is an existing water mains within the boundary of the site which should be considered as part of the site design and layout. In the event that there is a need to divert existing assets a formal application to Anglian Water would be required. Suggest the addition of a paragraph of supporting text to clarify the situation and a new policy requirement to read 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure'.	No changes are required for soundness, however the GNLP authorities accept that a minor modification could be made for clarity.	Make the following minor modification to add additional wording to the supporting text at the end of paragraph 6.100 for clarity: 'There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance'.

South Walsham and Upton with Fishley

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Policy 0382 Policy SWA1	NPS Property Consultants Ltd (Andy Scales) [14146]	23702 23703	Support	Support for allocation. Looking to deliver both sites in conjunction with each other. Would like to see flexibility in the policy wording to allow access from either Burlingham Road to the north or Chamery Hall Lane to the south.	The policies as worded are considered to be sound and therefore it is not necessary to make the changes suggested, however subject to agreement from Highways colleagues the	No change. If the Inspector is minded to make changes to policies GNLP0382 and SWA1 to give more flexibility regarding

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					GNLP authorities would not object to a proposed modification being put forward by the Inspector to give more flexibility regarding access.	access as a Proposed Modification then the GN authorities have no objection in principle to this depending on the view from Highways.

Non-Residential (chapter and site assessment booklets)

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
South Norfolk - Non residential, BKE3 Policy	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23900	Object	BKE3 Policy is directly adjacent to Atlas Gravel Workings CWS. We recommend that the site policy is updated in line with all other proposed allocations in proximity to CWS with a reference to the need for an ecological assessment as part of any application, in order to ensure that any development does not lead to permanent impacts to the adjacent CWS. This is likely to include a requirement for a buffer between any development and the CWS boundary, to safeguard against indirect impacts such as noise and light pollution.	The GNLP Team considers the policy for BKE3 as drafted to be sound. Especially as 'Policy 3 – Environmental Protection' sets out clear expectations. These include that development proposals should conserve and enhance the natural environment, avoid harm to designated and non-designated assets, deliver biodiversity net gain, contribute to the Recreational Impact Avoidance and Mitigation Strategy, and provide accessible natural greenspace of at least two hectares per 1,000 population. However, if the Inspector is minded to make a change to insert an additional policy requirement relating to the nearby County Wildlife Site as a Proposed Modification then the GN authorities have no objection to this.	If the Inspector is minded to make a change to insert an additional policy requirement to read 'Undertake an ecological assessment and provide mitigation for any adverse impacts on the nearby County Wildlife Site' as a Proposed Modification then the GN authorities have no objection in principle to this.
South Norfolk - Non residential, BKE3 Policy	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24052	Support	In relation to the wording of the BKE3 Policy we welcome the changes made to criterion 2 in relation to landscaping and boundary treatment. We also welcome the addition of bullet point 3 in relation to Arlington Hall.	Comment noted.	No change
Site Assessment Booklets and Studies, Appendix B Tables of Unallocated Sites with reasons for rejection	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24433	Object	Comment is associated to GNLP0177-BR, but in this context refers to the need for a new review of the strategic gaps and other areas between settlements at risk of coalescence to provide an up-to-date evidence base to inform new allocations. It is considered that a review into strategic gaps and coalescence should be undertaken. An initial assessment has been completed for the Hethersett- Cringleford strategic gap. A copy is enclosed with this representation. From this we can see that development can be accommodated safely within the identified areas without impacting upon or resulting in coalescence between the two settlements. This would open up highly sustainable land, with a wealth of public benefits and opportunities. As a consequence of this, it is considered that the allocation of small sites within the originally proposed area identified as Hethersett GNLP0177-	The issues raised here are addressed by the site assessment work, and GNLP0177-B continues to be considered unsuitable for inclusion. Another question was also raised to the strategic gap between Wymondham and Hethersett. This has indeed not been part of the GNLP and has not needed to be so. Should a review be	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				BR would be sustainable. This has been further evidenced through the procurement of a Parkland Management Plan for the site that would result in a strong preservation and enhancement of not only the historic assets but also the natural assets of the site whilst introducing new community and social infrastructure and opportunities for outdoor leisure and recreation through the creation of permission footpaths and access to the Parkland.	needed it would most likely be done as part of reviewing the Wymondham Area Action Plan, or possibly the Neighbourhood Plan if deemed a priority of the Steering Group.	

Costessey Contingency Site

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Costessey Contingency Site, 0581 2043 Policy	Taylor Wimpey (Mr Jordan Marshall, Strategic Land Manager) [19795]	23846	Support	Whilst not objecting to contingency site in principle allocating Land south of Townhouse Road Costessey GNLP0284R at reduced scale such smaller schemes which are immediately available and deliverable in order to meet under supply.	The plan is sound and as such no modifications are necessary to this effect. The Site Assessment sets out the reasons for not allocating this site. The main reason being potential adverse impact on the character of the designated river valley.	No change
Costessey Contingency Site, 0581 2043 Policy	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24053,	Object	<p>Within the site boundary, the grade II* listed Lodge Farmhouse lies to the south of the site. To the south west of the site lies the Bawburgh Conservation Area.</p> <p>Changes to plan: We suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable.</p>	The plan is sound. An HIA has been completed for this site as requested by Historic England which raises no significant concerns regarding the impact of the development	No change
Costessey Contingency Site, 0581 2043 Policy	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24057, 24060, 24067	Object	<p>We recommend that</p> <p>Changes to plan: a) evidence should be produced to define, explain and allow proper testing of the anticipated delivery rates of all committed and allocated sites. b) Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. c) Additional contingency sites should be identified to provide greater assurance that additional allocations could be made and delivered quickly if housing delivery in the plan area fell short of expectation. As with additional allocations referred to in b) above additional contingency sites should include small and medium sized sites sufficient to make a material impact on delivery and capable of quick delivery and build-out. d) Alternatively, other contingency sites should be identified to replace the Costessey contingency site.</p>	The plan is sound and as such no modifications are needed to this effect. Sufficient evidence has been provided in housing trajectory, likewise with sufficient sites with a variety of size hectare have been allocated including a significant buffer to provide the potential to accommodate higher growth rates as signalled both by the Government's "Planning for the Future and the Plan's projection figures.	No change
Costessey Contingency Site, 0581 2043 Policy	Barton Willmore/ Terra Strategic (Jordan Langdon-Bates, Senior Land and Planning Manager) [19992]	24244	Object	<p>Barton Willmore on behalf of Terra Strategic the site can deliver the educational land at the beginning of the period it is suggested that the site be considered as a full allocation , as the provision of a new primary school and sixth form college would help to reduce the existing pressure for pupil spaces as identified in site assessment and allow for growth within a Strategic Growth Area</p> <p>Changed to Plan: 977 dwellings</p>	The Plan is sound and as such no modifications are necessary. The Site Assessment sets out the site constraints identified and rationale for site selection and housing numbers for this site which have been agreed with DM officers and relevant bodies referenced in Site Assessment. The strategy states this site is a contingency site and as such no modifications are necessary to this effect.	No change

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Costessey Contingency Site, 0581 2043 Policy	CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]	24349	Object	On behalf of Jarrolds – objects to Site Assessment and outcome of not allocating clients' Site GNLP2173 – for Housing. There are inconsistencies in Site Assessment and SA Report approach taken between HEL1 'carried fwd sites' and 'new sites' GNLP2173.	The Plan is sound no modifications are necessary. Please see relevant section on responses to comments on Sustainability Appraisal Report and Site Assessment for these sites.	No change
Costessey Contingency Site, 0581 2043 Policy	Rosconn Group (Ben Ward, Senior Planning Manager) [19994]	24544	Object	RSL on behalf of site owners GNLP4034 land to the south of Flowerpot Lane, Long Stratton 7.48 ha for 150 dwellings approx. which is available and deliverable and was considered a reasonable alternative in site assessment.	The Plan is sound and as such no modifications are necessary. The Site Assessment and appendices set out the reasons for not allocating this site. This concluded that based on the Part 1 Strategy, no new allocations are being made in addition to the Long Stratton Area Action Plan. The Area Action Plan will be reviewed later, separately to the GNLP as the AAP is not being superseded by this Plan.	No change
Costessey Contingency Site, 0581 2043 Policy	Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]	24547	Object	specific concerns: the rate of delivery of sites, unmet housing need, the need to update NSPF (2019) and SCGs, the SA/ Site Assessment process and reasons for not pursuing reasonable alternatives. Wymondham - site GNLP0525BR for 500-600 dwellings at Norwich Common, Wymondham would be a more suitable alternative for inclusion under this policy. Other sites promoted at Diss and Poringland (GNLP2153) can realistically deliver within plan period.	The Plan is sound and as such no modifications are necessary. There is a high degree of confidence the sites allocated will be delivered. The NSPF (2021) has been updated. The Site Assessment concludes that based on revisions to the Part 1 Strategy, a contingency site or sites for 1,000 homes in Wymondham is not being sought. Neither is GNLP0525 considered a preferred alternative over GNLP0354R or GNLP3013. A third site allocation in Wymondham would be in excess of the strategic requirement for new homes as set out in the Part 1 Strategy.	No change.
Costessey Contingency Site, 0581 2043 Policy	ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]	24555	Object	Client Earth The CCC advises that 1) 'Net Zero housing and commercial developments, connected to sustainable transport infrastructure, walking and cycling and public transport need to become the norm, not the exception'. And 'new planning policy aligns with more widely sustainable transport and energy systems to support decarbonised heat as a norm, energy efficient bldgs.' Examples used: GNLP0581 (Contingency site) as undeveloped land which could contribute towards the urbanisation of countryside.	The GNLP conforms to legislation and national planning policy and guidance, and, subject to the above, has had regard to climate change issues. Site GNLP4045 is not allocated in the plan, GNLP0581 located in the urban fringe is a contingency site. The	No change

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					Site Assessment set out the rationale for these sites.	