

## Summary of Main Issues: Part 1 – The Strategy

### Foreword

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep Id/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Foreword	Mr Trevor Bennett [14599]	23266	Object	<p>The decision to increase the number of new homes to 49,500 is a political decision rather than based on need. There is a demand for considerably more new homes by inward migration, but there the need for more affordable homes could be met by the number of new homes in regulation 18. This means the number is not sound and does not meet legal compliance as there was no consultation.</p> <p>In respect of the number of new homes stay at the regulation 18 figure and aim to meet the need for more affordable homes by building homes run by the council.</p>	<p>The strategy for Aylsham set out in the plan is consider appropriate for this Main Town with a good range of services and the potential for growth. Overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage. Affordable housing requirements set out in policy 5 of the plan will apply to sites in Aylsham.</p> <p>See responses to Policy 1 and 7.2 for further information on growth in Aylsham.</p>	No change to the Foreword
Foreword	Colney Parish Council (Mrs H Martin, Clerk) [13644]	23536	Object	<p>On behalf of Colney parish, Colney committee have considered the plans, and would like it noted that they fully endorse the consultation response submitted by CPRE Norfolk regarding the plan.</p>	<p>Support for CPRE campaign noted.</p>	No change to the Foreword
Foreword	Mr Tommy Wilkinson [19843]	23579	Object	<p>The soundness is compromised by detail inaccuracies regarding Aylsham, its heritage and historical environment and lack of positive &amp; accurate growth development detail other than for dwellings. Legal compliance is not met through poor Community Consultation; Engagement &amp; Collaboration. Clear and positive consideration is needed of Aylsham’s preservation and conservation, individuality, roadways, as well as retail and commercial development.</p>	<p>The strategy for Aylsham set out in the plan is considered appropriate for this Main Town with a good range of services and the potential for growth. Overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage.</p> <p>See responses to Policy 1 and 7.2 for further information on Aylsham.</p>	No change to the Foreword
Foreword	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24200	Object	<p>The Foreword to the Pre-Submission Plan states (p. 5): “This plan identifies where growth is needed from 2018 to 2038, with Government targets leading to around 49,500 new homes being required.” The statement is incorrect. Firstly, the Standard Method calculation of Local Housing Need is only a starting point for establishing the housing requirement. Secondly, the Standard Method Local Housing Need (which is assumed to be what is being referenced as a ‘Government target’) does not ‘lead to’ a figure of 49,500 homes being required (or does it?) As such the statement confuses the identification of the housing need, with the proposed housing supply. Exactly what corrections are required will depend on the answers to the queries we raise in relation to Policy 1.</p>	<p>Comments noted. Although not required for soundness, it is agreed that minor modifications should be made to the Foreword to provide updates and clarification.</p>	<p>Make the following two minor modifications:</p> <ol style="list-style-type: none"> <li>1. Change first clause of the fifth paragraph to replace “is consulting on” to read:</li> </ol> <p>The Government <b>has consulted on</b> changes to the planning system ....</p> <ol style="list-style-type: none"> <li>2. Amend the first sentence of the</li> </ol>

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						<p>seventh paragraph to remove "required" to read:</p> <p>This plan identifies where growth is needed from 2018 to 2038, with Government targets leading to around 49,500 new homes being <b>provided for</b>.</p>

**Section 1 – 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
What is the Local Plan?, 1	Mr Trevor Bennett [14599]	23267	Object	Failure to work closely with North Norfolk. Work closely with North Norfolk, plans for development there have a much greater impact on Aylsham than developments in South Norfolk.	Work on strategic matters with North Norfolk has been ongoing for many years and has most recently primarily been addressed through the Norfolk Strategic Planning Framework (NSPF)	No change to the Introduction
What is the Local Plan?, 1  The GNLP and other local plan documents, 26  The GNLP and other local plan documents, 31	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23442 23447 23432	Object	<b>Public consultation</b> - the GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. Not holding the Reg. 18d consultation means there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation.	The 2012 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 Regulation 19 stage either because they have only recently become available or to better to meet needs. Plan preparation would be rendered very inflexible if all such changes required a further regulation 18 consultation.	No change to the Introduction
What is the Local Plan?, 1  The GNLP and other local plan documents, 26  The GNLP and other local plan documents, 31	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23442 23447 23432	Object	<b>Climate Change</b> - Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations.  On reading various historic papers of the GNDP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNDP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore.  To address climate change, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level. Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal	The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:  1.National targets regularly change so it is appropriate that GN should contribute to those national targets and those targets are updated when they change prior to adoption;  2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.  The overall housing numbers in the plan and the numbers identified for the village clusters are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post	No change to the Introduction

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				compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes planned for the district.	<p>Covid-19 recovery and the move to a post-carbon economy, as well as supporting the retention of services in villages. This approach to allowing for some growth in village clusters is in line with former strategic approaches. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.</p> <p>It is noted that the Bioabundance challenge to the South Oxfordshire Local Plan as described was unsuccessful and that the organisation has been required to pay the costs associated with its legal challenge to the plan.</p> <p>Whilst the GNLP authorities accept that a minor modification should be made to update the national carbon reduction targets to reflect the government's changes made in April 2021 in various parts of the plan, no changes are considered to be required to the Introduction.</p>	
<p>What is the Local Plan?, 1</p> <p>The GNLP and other local plan documents, 26</p> <p>The GNLP and other local plan documents, 31</p>	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23442 23447 23432	Object	<p><b>Housing Numbers</b> - To make the GNLP sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.</p> <p>The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high. Paragraph 11b of the NPPF specifically allows for a divergence from the standard method in cases where the scale of development would cause harm. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.</p>	<p>As stated above, the overall housing numbers in the plan and the numbers identified for the village clusters are considered suitable. The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then the homes above the housing need will not be delivered as there will not be a market for them. The strategy also uses local evidence to maximise deliverable opportunities on brownfield sites.</p>	No change to the Introduction

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<p>What is the Local Plan?, 1</p> <p>The GNLP and other local plan documents, 26</p> <p>The GNLP and other local plan documents, 31</p>	<p>CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]</p>	<p>23442 23447 23432</p>	Object	<p><b>South Norfolk Village Clusters Housing Allocations (SNVCHA) document</b> - while it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This is unsound, as the SNVCHA had not progressed sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided. The Reg. 19 GNLP Climate Change Statement states that ‘growth in villages is located where there is good access to services to support their retention’. It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP.</p>	<p>The Regulation 18 consultation on the SNVHCA will have been completed prior to the examination of the GNLP. This will provide further evidence that the degree of growth planned for the village clusters part of the hierarchy can be provided for in sustainable locations.</p>	No change to the Introduction
<p>What is the Local Plan?, 1</p> <p>The GNLP and other local plan documents, 26</p> <p>The GNLP and other local plan documents, 31</p>	<p>CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]</p>	<p>23442 23447 23432</p>	Object	<p><b>Policy 7.5 Small Scale Windfall Housing Development</b> - the very high level of current commitments, in excess of 31,000, provides developers with the flexibility that is necessary to address housing need. There can be no justification for adding in additional site options on the grounds that further flexibility is required to ensure delivery. If, despite these concerns, the policy is included in the GNLP we feel that its wording needs to be amended to remove ambiguity and help ensure communities with greater certainty as to where new development could be permitted. This should include a clearer definition of how a proposal should “respect” the form and character of the settlement.</p>	<p>See also the response on policy 7.5</p> <p>The policy widens the range of opportunity particularly for SMEs and self-build and gives weight to rural social sustainability. It takes a balanced approach through a ceiling on numbers intended to ensure any detrimental impact related to trip generation is minimised.</p> <p>The impact on form and character will vary site by site and is a standard form of policy wording.</p>	No change to the Introduction
<p>What is the Local Plan?, 1</p> <p>The GNLP and other local plan documents, 26</p> <p>The GNLP and other local plan documents, 31</p>	<p>CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]</p>	<p>23442 23447 23432</p>	Object	<p><b>The Norwich Western Link Road</b> is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: ‘for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.’ Policy 4 – Strategic Infrastructure suggests that ‘a virtuous circle’ where clean transport is prioritised, less use is made of cars, and this will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in ‘the end of the road? Challenging the road-building consensus’ (CPRE, 2017.)</p>	<p>The Norwich Western Link (NWL) is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p>	No change to the Introduction.

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What is the Local Plan?, 1	Mr Jerry Dicks [19899]	23558 23559	Support	To hopefully protect all parties interests.	Support noted.	No change to the Introduction.
What is the Local Plan?, 1	Mr Tommy Wilkinson [19843]	23575 23576 23577 23578	Object	Changes sought in respect of policies for Aylsham. Withdrawal of the second development site and consideration of other sites within the GNLP area as well as use of potential 'Brown field' sites. A publicly negotiated, announced and agreed set timetable and collaboration plan to involve the Aylsham Town Council, public community & local businesses on all future development plan negotiation.	The second site included at Aylsham is one of a number of sites included at the Regulation 19 stage to address the government's increased focus on housing delivery. The strategy aims to maximise the use of deliverable brownfield sites. The development of the GNLP has included three Regulation 18 consultation stages undertaken to an agreed timetable.	No change to the Introduction.
What is the Local Plan?, 1	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23600	Object	If the consultation also includes the Norfolk Broads Authority then it should also include North Norfolk District Council views. An example would be the Wroxham/Hoveton community which border BDC and North Norfolk. districts. The community share a primary care centre at Hoveton which serves residents of Salhouse, Wroxham, Rackheath and other smaller communities. I would like to see how this plan integrates with the rest of the county which consists of	Work on strategic matters has been ongoing with North Norfolk for many years and has most recently primarily been addressed through the Norfolk Strategic Planning Framework (NSPF). North Norfolk has not raised any concerns about the GNLP and evidence studies covering services and infrastructure needs have considered growth across the county in identifying additional needs arising.	No change to the Introduction

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				other district councils and there needs to be some links particularly for shared infrastructure. There should also be some acknowledgement of the joint strategic collaboration between BDC and South Norfolk Council and their joint management teams. There is also no mention in this introduction of the numerous neighbourhood plans undertaken at great cost and by a lot of hard work by volunteers.	There are over 30 references to Neighbourhood Plans (NPs) in the GNLP strategy, including in the introduction and appendix 4 which sets out those plans which are made and those which are being progressed. The GNLP will form the overarching strategy which future NPs will need to comply with. In most cases existing NPs are unaltered by the GNLP, though in some cases further sites have been added as the GNLP is generally set to last for a longer timeframe than NPs.	
What is the Local Plan?, 1	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23728	Object	Failure to consult with the Town Council and the neighbouring authority of North Norfolk. 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. There is no evidence in the document that there has been any consideration of what is happening in the area to the north, north east and north west of Aylsham, which is in North Norfolk Local Authority. Recent announcements regarding a development of 300+ houses at nearby Badersfield will have an impact on Aylsham, as the majority of children from Badersfield attend Aylsham High School.	<p>The housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a "alternative" at the Reg. 18C stage.</p> <p>See responses to Policy 1 and 7.2 for further information on Aylsham.</p> <p>Work on cross-boundary strategic matters has been ongoing with North Norfolk for many years and has most recently primarily been addressed through the Norfolk Strategic Planning Framework (NSPF) which evidences how the Duty to Cooperate has been addressed. North Norfolk has not raised any concerns about the GNLP and evidence studies covering services and infrastructure needs, including education, have considered growth across the county in identifying additional needs arising.</p> <p>The North Norfolk LP does not identify Badersfield as a location for major growth.</p>	No change to the Introduction
What is the Local Plan?, 3	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23602	Object	The plan runs from 2018 to 2038 and admits that these are rapidly changing times. This includes the impact of a post Covid 19 and Brexit environment as well as potential changes in central government with at least 4 general elections to have occurred during this time. There should a statement in the introduction on how the plan is going to be continually reviewed. It seems odd that the Tomorrow's Norfolk, Today's Challenge strategy includes all Norfolk councils yet this growth strategy does not. At the very least there should be links to the other growth strategies in this introduction so at least residents can access them to see the linkages.	<p>The Introduction to the plan in para. 4 includes references to GNLP review and the likelihood of it being superseded within a few years of adoption due to the government's proposed changes to the plan-making system.</p> <p>Tomorrow's Norfolk, Today's Challenge strategy is a climate change strategy adopted in 2008 which has been superseded by a number of more up to date strategies. Work on cross-boundary strategic matters including climate change has been ongoing with North Norfolk. This has primarily been addressed through the Norfolk Strategic Planning Framework</p>	<p>Make minor modifications to update para. 4 to:</p> <p>This plan has been prepared <del>under transitional arrangements</del> ahead of <b>the likely</b> implementation of the new system for plan-making Government has committed to introducing. It is highly likely that the GNLP will be superseded by a subsequent local</p>

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					<p>(NSPF) which evidences how the Duty to Cooperate has been addressed.</p> <p>However, the GNDP authorities accept that minor modifications to provide updates to the text on transitional arrangements would provide updates and assist the clarity of the plan.</p>	<p>plan produced under the new planning system within a very few years of its adoption</p> <p>Also make a minor modifications to remove the reference to transitional arrangements so that footnote 3 reads:</p> <p>The commitment to a new system of local plan making was made through the "Planning for the Future" white paper in August 2020. <del>As drafted in late 2020, the transitional arrangements for the next round of local plans required such new plans to be adopted either 30 months from the legislation being brought into force, or 42 months for those who have adopted a local plan within the previous three years or where a local plan has been submitted to the Secretary of State for examination.</del> Whatever the content of the final <del>transitional</del> arrangements <b>for new local plans</b> and the timing of the adoption of the GNLP, it is thus very likely to be superseded within a few years of adoption.</p>

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What is the Local Plan?, 3	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23742 23743	Object	The process of community involvement should be in general accordance with the LPA's Statement of Community Involvement (SCI), but 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".	The three Regulation 18 consultations, including a draft plan with alternatives for housing sites and numbers in the main towns, followed by the Regulation 19 publication stage, constitute effective consultation.  Across Greater Norwich, a number of alternative sites previously consulted on, including a second site in Aylsham, have been included in the Reg. 19 plan. This is a sound approach to plan-making which reflects consultation regulations and Broadland's SCI.	No change to the Introduction
What is the Local Plan?,3	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	24523	Object	It is considered that the spatial strategy of the GNLP would be better suited to following a more traditional and sustainable approach to the distribution of growth through the agreed settlement hierarchy. In the case of South Norfolk, Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site. The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.  It is believed that there are also mixed messages coming from the GNLP process. During the Reg 18(c) stage, Wymondham had a contingency identified for 1,000 new homes, however this has now been removed at the current Reg 19 stage. Conversely, Costessey (without comparable linkages or connections to Wymondham) had a contingency site identified at Reg 18(c) stage, which has carried through to an 800-unit contingency site in the Reg 19 document. This approach appears wholly unjustified and inconsistent.  What is clear is that GNLP Reg 19 document appears to place an overreliance on delivery coming forward through 'windfall sites', with a significantly disproportionate amount of housing growth being directed to the 'Village Clusters'. However, the South Norfolk Village Clusters Housing Site Allocations Local Plan is yet to be produced. Therefore, it is surely unjustified to place a reliance on a document that itself has yet to be tested.	The strategy for Wymondham reflects the fact that there is significant existing commitment in the town (2,465 homes), with 150 further homes added through the GNLP. This is the highest of any of the main towns. The inclusion of a potential contingency of 1,000 homes at the Reg.18C stage at an unnamed site allowed for flexibility at that stage of plan-making. No additional site in the town was required in the Reg.19 plan due to changed circumstances in relation to sites elsewhere. The contingency site at Costessey has been retained in the plan due to the settlement hierarchy and its location between two existing growth areas in the Norwich Urban Area.	No change to the introduction
What is the Local Plan?, 4	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23603	Object	Given the "Planning for the Future" White Paper, the GNLP is thus very likely to be superseded within a few years of adoption), then why bother now? I would assume that all GNLP member councils would have made some representation to the "Planning for the Future" White Paper	Government has set a requirement that up to date NPPF compliant plans must be adopted by local planning authorities by the end of 2023 so there is a need to progress the GNLP.	No change to the Introduction

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				and if so then I would like to see links to those representations to see what the individual councils actually stated or was it the GNLP that made one representation on their behalf?		
Setting the scene - a vibrant place to live and work, 7	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23610	Object	Interesting use of the term 'dynamic villages' as these plans for large developments on the edge of Norwich City do nothing to improve existing villages. Indeed the exact opposite. My village has lost both its Pub and Post Office in the last two years as locals have no affordable housing or employment that allows them to remain in their village many of who were born in the village. To ensure rural communities thrive they need a varied supply of housing. ACRE (Action with Communities in Rural England ) supports appropriate development in rural areas, especially the provision of affordable housing.	Policy 5 of the GNLP provides for affordable housing on allocated housing sites. One of the reasons for the choice of the 12 homes minimum allocation site threshold is to ensure that affordable housing is provided on allocated sites.	No change to the Introduction
Setting the scene - a vibrant place to live and work, 8	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23607	Object	We have already seen during the Covid 19 pandemic a huge change in peoples behaviours and attitudes particularly among the millennials who will be the generation most impacted by these plans. I would like to see how these plans are future proofed with the expected pace of change outstripping anything seen in the past. Things like home working facilities, drone landing capabilities, driverless cars etc.	The plan includes a number of flexible policies which take account of likely changes in society and technology e.g. it is not prescriptive over energy supplies as there is little doubt that the most suitable sustainable technologies will change over time. Plans are also required to be reviewed regularly to keep them up to date in this time of rapid technological change.	No change to the Introduction
Setting the scene - a vibrant place to live and work, 8	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23744	Object	Reg 19 states that it has considered the impact of Covid. However, there is a lack of analysis to show how that will impact on Aylsham's way of life and economy post pandemic. In Reg 18, Aylsham was allocated one site. Then, in the middle of the Covid crisis, the town was allocated two sites without consultation, or consideration that more brownfield sites may become available when the crisis is over.	The plan has been updated, based on newly collected evidence, to reflect potential changes related to Covid. As set out above, the second site now proposed for allocation in Aylsham was consulted on as an alternative option at Reg.18C. Brownfield sites proposed by site owners for allocation in the plan have been revisited to take account of more up to date evidence, with the East Norwich allocation doubled to 4,000 homes. Although some other brownfield sites may come forward as a result of economic changes, most likely in the city centre, this is likely to be on a piecemeal basis. Such sites cannot be allocated and their delivery to meet housing needs is less certain than allocated sites.	No change to the Introduction
Setting the scene - a vibrant place to live and work, 9	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23611	Object	The original Joint Core Strategy (JCS) was found to be unlawful in 2012 due to the absence of a legally required Strategic Environmental Assessment. Mr Justice Ousley was critical of the methodology used in the development of the original JCS and compared it as "wading through treacle". I would like to see an acknowledgement of this court finding in the introduction and some admission that	Every effort has been made to ensure that the extensive and, at times complex, evidence for the GNLP and the plan itself is as transparent and well-presented as possible.	No change to the Introduction

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				lessons learnt from the legacy JCS have been learnt in this Plan.		
Planning to Our Strengths, 10	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23612	Object	The Cambridge Norwich Tech Corridor links universities in Cambridge and Norwich, with research institutes and science parks such as the Wellcome Genome Campus, Babraham Research Campus, Hethel Innovation Centre and Norwich Research Park. These are all located in the south and south west boundaries of Norwich whereas the planned houses are in the North East Growth triangle. I see no correlation between this planned housing and the increased employment opportunities in the tech corridor. I would like to see how the large number of homes planned for the growth actually link to the employment hot spots in the Tech Corridor and particularly how the rare public transport links are between the two opposite ends of Norwich city.	The Tech Corridor initiative is relevant to the whole of the Norwich Urban area and its planned urban extensions, as well as to the corridor to the south-west of the city. The whole of this area is identified as the Strategic Growth Area in the GNLP. Different economic specialisations, identified at the strategic scale through the Norfolk Strategic Planning Framework (NSPF) and included in policies 1 and 6 of the GNLP, allow for different types of employment growth in different locations to provide a broad-based economy as well as allowing for high tech growth.	No change to the Introduction
Planning to Our Strengths, 11	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23613	Object	I would like the plan to list these environmental assets and how they are measured as an environmental asset. The System of Environmental-Economic Accounting (SEEA) Chapter 5 (Asset Account) defines environmental assets as "the naturally occurring living and non-living components of the Earth, together comprising the biophysical environment, that are used in production and that deliver ecosystem services to the benefit of current and future generations". What are the environmental assets mentioned here?	The GNLP is a strategic plan which sets out high level protection policies for nationally and locally protected historic and natural environmental assets. These assets are detailed, identified and mapped in existing Development Management plans. The GNLP includes a new requirement for biodiversity net gain on development and a continued approach to developing the green infrastructure network. This network is mapped at the strategic scale in the GNLP and will be protected and enhanced over time.	No change to the Introduction
How the GNLP fits in with other Planning bodies and strategies, 18	Marine Management Organisation (Georgie Sutton, Marine Planner) [19670]	23263	Support	The Greater Norwich Local Plan should have regard to the East Marine Plans under section 58(3) of the Marine and Coastal Access Act 2009. Also, the Greater Norwich Local Plan should include reference to the East Marine Plans to be deemed 'sound'. Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your local plan. Policies: EC1, EC2, EC3, SOC1, SOC2, SOC3, ECO1, BIO1, BIO2, CC1, CC2, GOV1, PS1, PS2, PS3, TR3; but please make your own interpretation and see our online guidance ( <a href="https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-councils">https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-councils</a> ),	Work is ongoing to assess whether a reference should be included to the East Marine Plan in the introduction, potentially including the most relevant policies listed in the representation. If so, it will be proposed it as a minor modification to the introduction (most likely following paragraph 17), possibly referencing the relevant policies in a footnote or appendix.	Investigate potential for a minor modification

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
How the GNLP fits in with other Planning bodies and strategies, 18	Mid Suffolk District Council (Mr Robert Hobbs, Corporate Manager - Strategic Planning) [19541]	23859	Support	Mid Suffolk District Council supports the Greater Norwich Local Plan as published and the overall plan-making process for the GNLP has enabled effective engagement for Mid Suffolk District Council.	Support and acknowledgement of engagement noted.	No change to the Introduction
How the GNLP fits in with other Planning bodies and strategies, 18	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24205	Object	Breckland District Council would welcome the earliest opportunity to engage with GNLP to explore the location and impact of any proposals in the Honingham Thorpe, Hethel and Silfield area on infrastructure including power and water as well as the impact on Breckland's communities living nearby and to work jointly to minimise any adverse effects which may arise as a result. However, the Council's main concerns are the cumulative impact of the growth on infrastructure particularly power which has been identified as a constraint in this area in the Greater Norwich Energy Study April 2019. Sufficient water resources both supply and waste management is also a concern as indicated in the Anglian Water Resources Management Study 2019.	<p>The GNLP does not allocate any of the proposed new settlements. It does though state the intention in policy 7.6 to include one or more new settlements in the next plan. The councils will work, as per the Statement of Common Ground, with Breckland DC on new settlements.</p> <p>The issues of power and water supplies have been considered and are being addressed on an ongoing basis with the utilities providers (UK Power Networks and Anglian Water (AW)).</p> <p>This is being done through cooperative work which both Breckland and Greater Norwich are engaged in, including through the NSPF and the Cambridge Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of the utilities companies. AW is planning for water transfers from Greater Norwich to Breckland.</p> <p>As per the SoCG, the councils will work together to lobby the utilities providers to ensure that water and power needs are met.</p>	No change to the 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
The GNLP and other local plan documents, 22	David Lock Associates (Heather Pugh, Partner) [20014]	24451	Object	<p>Having both policy and allocations set out in a number of separate documents can cause complexities for stakeholders in assessing and coming to an informed view about the overall sustainability and environmental impact of the 'plan' in its entirety. it would be useful to aid understanding and provide clarity if Appendix 4 of the GNLP was expanded to provide a matrix/ 'progress' table of:</p> <p>(a) the policies and allocations already adopted and what sites and developments are already committed under these policies.</p> <p>(b) the development to be delivered under the other DPDs yet to be produced/Examined.</p> <p>(c) what policies/sites are yet to be implemented through the AAPs.</p> <p>In order to ensure that the full impact of the Reg 19 plan has been robustly assessed, we would welcome clarity from the GNLP as to how the cumulative SA testing of these plans with the Reg 19 plan has been undertaken. Similarly, it may be worth setting out in both the plan and the Local Development Scheme (LDS) how the new settlement assessment process currently identified in paragraph 401 of the GNLP dovetails with the timescales for the various DPD adoptions (most notably, the South Norfolk Village Clusters document).</p>	<p>The submission plan will include a detailed housing trajectory which will set out progress on sites allocated under the various adopted plans in Greater Norwich. This will continue to be updated annually through the Annual Monitoring Report which will continue to set out the 5-year land-supply for the area and those sites which will deliver later in the plan period.</p> <p>The SA sets out how the cumulative impact of the existing and new allocations has been assessed.</p>	No change to the Introduction
The GNLP and other local plan documents, 24	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23955	Object	<p>You will be aware that we have raised some concerns regarding the fact that you are not proposing to update the Development Management policies. Nevertheless, the new text in paragraph 24 makes it clear that the GNLP will be used in conjunction with the existing adopted Development Management Policies. Whilst we accept that this is a perfectly acceptable approach to Plan review, and indeed many of the policies set out in the existing adopted Development Management Plans and the City Centre Conservation Area Appraisal are good and valuable, Historic England continues to have concerns that this still leaves some policy areas lacking. In particular we are concerned that there is a lack of strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.</p>	<p>Ongoing work is taking place on historic assessments to address Historic England's concerns. These primarily relate to differing interpretations of the amount of detail which is appropriate in a strategic plan which is supported by existing adopted development management policies. It is likely that an SoCG will be produced to identify any outstanding areas for debate at the examination.</p>	No change to the Introduction
The GNLP and other local plan documents, 26	Mr Trevor Bennett [14599]	23561	Object	<p>The response from the CPRE highlights why Reg. 19 should be withdrawn on a failure of soundness. It emphasises why there needs to be full consultation and a more thoughtful and analytical approach to any further development.</p>	<p>There has been extensive consultation on the GNLP supported by a detailed evidence base. Consequently, it is considered that a sound approach has been taken to plan-making.</p>	No change to the 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
The GNLP and other local plan documents, 26	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23870	Object	<p>The village of Rackheath is part of BDC “growth triangle”. In 2009 it was identified as one of a dozen proposed sites to create new carbon-neutral eco-communities. The government subsequently withdrew this particular programme, but in 2016 a new Masterplan was published. The interested parties consisted of Manor Farm, Barratt Homes and BDC. We believe that the interested parties are no longer interested making this element of the planned housing supply redundant.</p> <p>North Rackheath is one of the largest allocations for development in the current local plan and it has been stalled for around 10 years as it hasn't been financially viable for the developers to commit to developing the site. BDC policy includes a target for 33pc affordable housing but also states that the proportion of affordable housing sought may be reduced where it is shown through a viability study that this target cannot be met.</p>	The updated housing trajectory to be submitted with the plan will provide some further detail on anticipated delivery of the North Rackheath site.	No change to the Introduction
The GNLP and other local plan documents, 32	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24206	Object	Breckland District Council is interested in the location of these additional 1200 homes, and whether they too will be allocated between A47 and A11. An additional 1200 homes, along with existing allocations at Easton and Wymondham plus Breckland’s growth plans will put further pressure on infrastructure of power and water.	<p>Breckland and Greater Norwich LPAs have supported coordinated growth in the Cambridge Norwich Tech Corridor through various initiatives. The GNLP has not added significantly to the growth planned for this area as existing plans for Greater Norwich, adopted ahead of the Breckland Local Plan, already provide significant commitments in the area. Most of these sites have now progressed to the planning application stage.</p> <p>The issues of power and water supplies have been considered and are being addressed on an ongoing basis with the utilities providers (UK Power Networks and Anglian Water (AW)).</p> <p>This is being done through cooperative work which both Breckland and Greater Norwich are engaged in, including through the NSPF and the Cambridge Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of the utilities companies. AW is planning for water transfers from Greater Norwich to Breckland.</p> <p>The councils will work together, as per the emerging Statement of Common Ground, with the utilities providers to ensure that water and power needs are met.</p>	No change to the Introduction

**Section 2 – Greater Norwich Profile**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Population, 38  Emissions and Climate Change, 97	Ann Nix [19995]	24273 24274	Object	<p>Paragraph 38. states that carbon emissions are above the national average in rural parts of the area, partly due to a greater reliance on car journeys. I see no mention in the plan of providing frequent low-carbon public transport links to the villages in the Plan area.</p> <p>Paragraph 97 states that “policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate.” I see little evidence of this in the plan.</p> <p>Paragraph 156 states that local plans must set strategic polices which address climate change mitigation and adaptation. What provisions will be made for infrastructure for electric cars?</p> <p>Given the projected population growth, the number of new houses planned seems excessive and is significantly above the government target for new homes.</p> <p>Paragraph 188d states “The approach to village clusters is innovative”, but how? The best way to sustain rural communities is to ensure that they are well connected to local service centres, retail and cultural facilities, and employment opportunities. There is little sign of this in the plan.</p>	<p>The plan provides policies in relation to the representation for promoting:</p> <ul style="list-style-type: none"> <li>• electric car use (policy 2)</li> <li>• sustainable transport (policies 2 and 4)</li> <li>• the retention of and access to rural services and facilities (policies 1 and 7.3-7.5)</li> </ul>	No change to the profile.
Housing, 53  Emissions and Climate Change, 93  Emissions and Climate Change, 97	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<p><b>Public consultation</b> - the GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. Not holding the Reg. 18d consultation means there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation.</p>	<p>The 2012 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 Regulation 19 stage either because they have only recently become available or to better to meet needs. Plan preparation would be rendered very inflexible if all such changes required a further regulation 18 consultation.</p>	No change to the profile

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Housing, 53  Emissions and Climate Change, 93  Emissions and Climate Change, 97	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<p><b>Climate Change</b> - Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations.</p> <p>On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore.</p> <p>To address climate change, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level. Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of</p>	<p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:</p> <ol style="list-style-type: none"> <li>1. National targets regularly change so it is appropriate that GN should contribute to those national targets and those targets are updated when they change prior to adoption;</li> <li>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</li> </ol> <p>The overall housing numbers in the plan and the numbers identified for the village clusters are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19 recovery and the move to a post-carbon economy, as well as supporting the retention of services in villages. This approach to allowing for some growth in village clusters is in line with former strategic approaches. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.</p> <p>It is noted that the Bioabundance challenge to the South Oxfordshire LP as described was unsuccessful and that the organisation has been required to pay the costs associated with its legal challenge to the plan.</p> <p>As stated above, the overall housing numbers in the plan and the numbers identified for the village clusters are considered suitable. The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then the homes</p>	Whilst it is accepted that a minor modification should be made to update the national carbon reduction targets elsewhere in the plan to reflect the government's changes made in April 2021, no changes are considered to be required to the profile.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					above the housing need will not be delivered as there will not be a market for them. The strategy also uses local evidence to maximise deliverable opportunities on brownfield sites. The Regulation 18 consultation on the SNVHCA will have been completed prior to the examination of the GNLP. This will provide further evidence that the degree of growth planned for the village clusters part of the hierarchy can be provided for in sustainable locations.	
Housing, 53  Emissions and Climate Change, 93  Emissions and Climate Change, 97	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<p><b>Housing Numbers</b> - To make the GNLP sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.</p> <p>The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high. Paragraph 11b of the NPPF specifically allows for a divergence from the standard method in cases where the scale of development would cause harm. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.</p>	As stated above, the overall housing numbers in the plan and the numbers identified for the village clusters are considered suitable. The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then the homes above the housing need will not be delivered as there will not be a market for them. The strategy also uses local evidence to maximise deliverable opportunities on brownfield sites.	No change to the profile
Housing, 53  Emissions and Climate Change, 93	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<p><b>South Norfolk Village Clusters Housing Allocations (SNVHCA) document</b> - while it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This is unsound, as the SNVCHA had not progressed</p>	The Regulation 18 draft plan consultation on the SNVHCA is ongoing and will have been completed prior to the examination of the GNLP. This will provide further evidence that the degree of growth planned for the village clusters part of the hierarchy can be provided for in sustainable locations.	No change to the profile

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Emissions and Climate Change, 97				sufficiently for a potential change to the “minimum” reference be considered, nor has ‘evidence been provided. The Reg. 19 GNLP Climate Change Statement states that ‘growth in villages is located where there is good access to services to support their retention’. It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP.		
Housing, 53 Emissions and Climate Change, 93 Emissions and Climate Change, 97	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<b>Policy 7.5 Small Scale Windfall Housing Development</b> - the very high level of current commitments, in excess of 31,000, provides developers with the flexibility that is necessary to address housing need. There can be no justification for adding in additional site options on the grounds that further flexibility is required to ensure delivery. If, despite these concerns, the policy is included in the GNLP we feel that its wording needs to be amended to remove ambiguity and help ensure communities with greater certainty as to where new development could be permitted. This should include a clearer definition of how a proposal should “respect” the form and character of the settlement.	See also the response on policy 7.5  The policy widens the range of opportunity particularly for SMEs and self-build and gives weight to rural social sustainability. It takes a balanced approach through a ceiling on numbers intended to ensure any detrimental impact related to trip generation is minimised.  The impact on form and character will vary site by site and is a standard form of policy wording.	No change to the Profile
Housing, 53 Emissions and Climate Change, 93 Emissions and Climate Change, 97	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<b>The Norwich Western Link Road</b> is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: ‘for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.’ Policy 4 – Strategic Infrastructure suggests that ‘a virtuous circle’ where clean transport is prioritised, less use is made of cars, and this will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in ‘the end of the road? Challenging the road-building consensus’ (CPRE, 2017.)	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change to the profile
Housing, 53 Emissions and Climate Change, 93	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23426 23428 23427 23444	Object	<b>Green Belt</b> - para. 118 of the Reg. 19 GNLP merely states that ‘Greater Norwich does not have a nationally designated Green Belt. National Policy is clear that new Green Belts should very rarely be established. Therefore, this plan will need to carry forward policies for protecting our valued landscapes.’ Instead, CPRE Norfolk argues that a thorough examination of the evidence for a Green Belt should have been carried	Regulation 18 included consultation on the potential for a Green Belt. To be used along with adopted development management policies including strategic gaps, the strategic approach of protecting valued landscapes provides the policy coverage required. The NPPF requires exceptional circumstances for the establishment of new Green Belts. Establishing a Green Belt at this stage would	No change to the profile.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Emissions and Climate Change, 97				<p>out, as the NPPF does allow for the creation of new green belts in the right circumstances. CPRE Norfolk would like an explanation as to why the exceptional circumstances for creation of a Green Belt for Norwich as required by the NPPF do not exist.</p> <p>It is our belief that a decision not to pursue a Green Belt for Norwich through inclusion within the draft GNLP was taken without a full assessment of the evidence having taken place, which therefore raises questions about both the legal compliance and soundness of the Plan. To address this, CPRE Norfolk suggests a Green Belt on the 'green wedges' model. This evidence is presented in a paper by CPRE Norfolk: 'A Green Belt for Norwich?'</p>	reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.	
Population, Table 1 Population of the largest settlements in Greater Norwich	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23876	Object	<p>It is a little misleading to ignore the population of Salhouse whilst including Wroxham. Salhouse sits between Rackheath and Wroxham and although outside of the growth area it will nevertheless be impacted by these plans and the urban sprawl eastwards. The Salhouse population is estimated to be 1,016 and they use the same infrastructure and facilities as the residents in the growth area. Indeed the plans for Rackheath North and development centred on the old Rackheath airfield, dissected by Muck Lane, abuts right up to the Station Road conurbation that was once part of Rackheath but is now in Salhouse. I would like this plan to be more transparent and acknowledge the impact these plans will have on those communities that may sit outside of the designated growth area but are still reliant on the same services and infrastructure.</p>	<p>Table 1 on page 11 of the strategy includes the populations of the largest settlements in Greater Norwich in the 2011 census.</p> <p>If available prior to the completion of the examination into the plan, it is accepted that updated data from the 2021 census should replace the 2011 data in the table.</p> <p>Please note that Mulbarton was excluded from the table in error and should be included.</p> <p>The plan provides evidence and requirements for the additional services needed across the area to serve growth.</p>	If available during the plan's examination, minor modifications should be made to update the population table with 2021 census data for populations for the largest settlements in Greater Norwich.
Population, 39	Mr John Hill [15088]	23717	Object	<p>I consider that over-reliance on the traditional planning approach of analysing past trends, projecting them into the future and converting the figures into additional land requirements may simply result in "more of the same". I consider that it should be made clear that the population projections, whilst being part of the Greater Norwich area profile, are not necessarily the major determinant of future land requirements especially the requirement for additional greenfield housing allocations. It should also be clarified that local projections should be seen in the context of national trends and projections in other regions and parts of the United Kingdom.</p>	<p>This profile sets out a broad overview of the current situation in Greater Norwich in relation to key planning issues.</p> <p>Policy 1 and its accompanying topic paper (available for submission), along with the settlement summaries on site selection, provide an explanation of how the land requirements to serve growth have been identified.</p>	No change to the profile

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Population, 40	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	23663	Object	Within paragraph 40, it is noted that the standard methodology was originally based on the 2014 growth projections, with the GNLP then deciding to move towards using the 2018 projections for the growth identified within the Plan's housing requirements. Welbeck Land would suggest that the 2018 figures do not actually go far enough. For example, they do not allow for the impact of Covid-19, nor the influx of additional housing demand that will be placed on an area, which in turn will increase economic activity and impact on the infrastructure requirements to be provided within the Plan. It is admitted that this is impossible to plan or legislate for, but it does indicate that no 'slack' for unexpected growth has been allowed for within the Plan, or in the most sustainable locations. Welbeck Land strongly agrees with paragraph 51 which states that the "GNLP needs to plan for additional housing needs above and beyond existing commitments based on evidence." It is therefore exceedingly disappointing that this approach has not been carried forward within the rest of the Reg 19 document.	Policy 1 and its accompanying topic paper (available for submission) provide an explanation of how the land requirements to serve growth have been identified. An appropriate amount of housing growth is included in the plan to meet housing need identified through the standard methodology and to support sustainable economic growth.	No change to the profile
Population, 40	Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]	24166	Object	<b>Housing Numbers</b> A 5% buffer is required by the NPPF and there is good reason for the GNLP to use a 5% buffer given that 78% of housing is on greenfield sites and is unsustainable. it is possible to take a cautious view of the predicted household growth derived from the 2014 methodology (Household Projections:2014- 2039). Under that methodology population growth accounts for 95% of household growth of which 43% is due to immigration. The England and Wales Total Fertility Rate for 2020 was 1.6 (2019 1.65, 2014 1.85, 2012 1.93)- i.e. it is now well below the rate of replacement. The pandemic and Brexit may lead to falls in the non UK-born population, and this is suggested by data from the ONS labour force survey to sept 2020. The minimum figure of 42,568 (40,541+ 5% buffer) should therefore be the housing target, both to reduce the harm of the proposed development, and to reflect recent demographic changes.  Climate Change and Use of Greenfield Land Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies	The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then the homes above the housing need will not be delivered as there will not be a market for them. The strategy also uses local evidence to maximise deliverable opportunities on brownfield sites.  The growth strategy is not one of dispersal but does include a limited amount of growth in and around villages to support the retention of services and provide opportunities to be housed locally.  The climate change statement sets out how the plan addresses and mitigates the impact of climate change through a broad ranged approach. It is important that any plan addresses the environmental, social and economic aspects of sustainability as identified in the SA. The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning	No change to the profile

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>designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'. On this aspect the GNLP is unsound. The Jan 2021 Sustainability Appraisal and Strategic Environmental Assessment produced for GNDP lists 13 significant and/or cumulative adverse effects which will result from the GNLP and which are not mitigated by other aspects of the plan.</p> <p>Failure to follow NPPF guidance on conserving and enhancing the natural environment (section 15) Much of the harm identified by the Sustainability Appraisal and Strategic Environmental Assessment is due to the use of greenfield sites. Large scale greenfield development in Greater Norwich is inherently unsustainable and runs contrary to the guidance in NPPF para 107. 78% of housing (38,600 houses) is on greenfield sites. In addition, over 300ha is allocated to commercial use. 1019 ha in total of previously undeveloped land will be used. The plan allocates 4,220 houses to 'village clusters' and 6,800 to surrounding towns, plus windfall housing, and this is likely to be particularly harmful. Such development is contrary to good planning policy and is unnecessary. Large amounts of office and retail space in the city centre are likely to be redundant following the pandemic and to become available for redevelopment.</p> <p>Road Building and Aviation The GNLP promotes large scale road building, including the Norwich western link road, ignoring the well-established fact that new road construction induces further road demand and is therefore unsustainable in terms of emissions as well as being directly destructive of the environment. It causes increased traffic in other parts of the road network.</p> <p>While there is a requirement in the NPPF to maintain general aviation airfields, the GNLP commits to expanding this highly polluting and unsustainable industry. Policy 4 of the GNLP (strategic infrastructure) supports 'the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond'. The area</p>	<p>application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p> <p>Policy 4 on strategic infrastructure reflects national and local transport plans, including aviation policy supporting the growth of Norwich Airport as a regional airport.</p>	

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				<p>allocated for aviation and business linked to the airport is 85.5 hectares (allocated but undeveloped plus proposed), by far the largest allocation by primary employment use.</p> <p>Sustainable transport provision in the GNLP If the plan is to meet the requirements of the NPPF, then proposals for sustainable transport should be part of decision making from the earliest stages (NPPF para 102) and should be included in the plan and should form part of the assessment for development sites. However there are no such proposals in the GNLP. Moreover, existing infrastructure is described inaccurately, if at all.</p> <p>Effect on Coltishall Coltishall is a historic village on the River Bure with about 1500 inhabitants. The village is midway between Norwich and North Walsham on the B1150. The B1354 also runs through the village. 2018 data from speed cameras show that there were approximately 5.2 million vehicle movements per year through the village. The level of traffic in Coltishall diminishes the quality of life of those living and working in the village and impacts their health. The High Street and Station Road are acutely affected.</p> <p>Coltishall has experienced major traffic growth in recent years as a result widespread development outside Norwich and the construction of the NDR. Coltishall has a single inadequate, expensive, and unreliable bus service connecting the village to Norwich and North Walsham. There is no bus to the nearest town Wroxham where there is a rail station. There is no provision for cycling. Road junctions and pavement widths prioritise vehicle movement over pedestrians. Coltishall will suffer further traffic growth due the Norwich Western Link Road and dispersed housing development.</p>		
Population, Greater Norwich estimated population 2018 to 2038 graph	Mr Trevor Bennett [14599]	23281	Object	The estimate for population increase in Greater Norwich depends on 3 main factors: increased birth rate, which is now in decline, death rate which had been falling, but not in the past year and migration into the area. This will depend not just on demand, which will be high, but also supply. By putting forward a high numbers of homes to be built the increase in supply will increase the demand. That is not a sound policy for an area whose economic future is not as bright as the	<p>An appropriate amount of housing growth is included in the plan to meet housing need identified through the standard methodology and to support sustainable economic growth.</p> <p>The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then</p>	No change to the profile

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				GNLP imagines. Brexit will also mean less migrants from abroad. Be aware that population estimates are rarely accurate and that they can be controlled. Therefore do not have policies that increase the population.	the homes above the housing need will not be delivered as there will not be a market for them.	
Health and Wellbeing, 45	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23880	Object	I find this plan not sound as it does not refer, in this Health and Wellbeing section to the Norfolk Joint Strategic Needs Assessment (JSNA) which is the standard tool when predicting future health needs and trends in order to inform on housing and other factors. I would like to see a cross referencing to the Norfolk Joint Strategic Needs Assessment (JSNA) and in particular the views of Healthwatch.	<p>This profile sets out a broad overview of the current situation in Greater Norwich in relation to key planning issues.</p> <p>The JSNA provides information from a central resource for health care commissioners and as such has been used as part of the evidence base.</p> <p>The policy requirements for the health care needs to serve the planned for growth is in policy 4. Appendix 1 of the GNLP identifies priorities. The information in appendix 1 is taken from the Greater Norwich Local Plan Infrastructure Report which includes the need for health care infrastructure established through the Health Infrastructure Delivery Plan (HIDP) drawn up by the Sustainability and Transformation Partnership (STP). The latter partnership represents health care providers. The HIDP will be updated to reflect changing needs over time and will inform annual updates to Greater Norwich infrastructure plans.</p>	No change to the profile
Health and Wellbeing, 46	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23796 23801	Object Support	Rackheath continues to be the focus of housing development and it is imperative that the bigger picture is considered in relation to infrastructure, services and connectivity to ensure that the existing Rackheath community is not impacted by this large-scale development. Medical provisions must be able to accommodate the community growth and be available within Rackheath.	See also the response above. Appendix 1 identifies that health care facilities to serve growth to the north of Norwich (including Rackheath) will either be provided through the expansion of existing facilities or by the provision of a new facility. Updates to the Health Infrastructure Delivery Plan will confirm the approach to be taken.	No change to the profile
Health and Wellbeing, 46	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23885	Object	The post Covid NHS will look very different from now and when these plans were developed. The plans for Primary Care Networks are particularly relevant for these plans as the primary care environment divides into localities with the Norwich and North Norfolk localities mostly impacted with these plans. I'm not convinced that the planned health facilities will be funded correctly. I would like to see a link to the Norfolk and Waveney Health Care Partnership and their plans,	Please see the response to rep. 23880 above on health care provision.	No change to the profile

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				with an aging population, to sustain their Enhanced Health in Care Homes programme.		
Housing, 51	Mr Trevor Bennett [14599]	23394	Object	The problem is with your evidence, there is little understanding shown on the potential changes in population, the economic prediction lack clarity and there has been little consideration of the likely impact of Covid and Brexit. A rose-tinted view of the economy is not likely to be met in practise and to determine housing policies on the evidence you have shown is going to be problematic for the area.	The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then the homes above the housing need will not be delivered as there will not be a market for them. The extensive and updated evidence base has taken account of the impacts of both Brexit and Covid-19.	No change to the profile
Housing, 52	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23794	Object	Rackheath has already had a considerable number of sites allocated as part of the 5-year land supply and we would not like to see additional sites being added whilst so much of the allocated land is awaiting development. Existing sites should be fulfilled before new ones are allocated.	Given the scale of housing need locally it is not considered suitable to phase housing delivery. The plan adds two further small sites in Rackheath which have both been shown to be sustainable and deliverable.	No change to the profile
Housing, 53	Mrs Eleanor Laming [19916]	23592	Object	<p>There is insufficient detail on mitigation of and adaptation to climate change. 22% more homes are proposed in addition to the level needed. Regulation 19, paragraph 53 in the GNLP says that only a 5% buffer is required by the NPPF. A new road, the Norwich Western Link Road is included in the GNLP. This is incompatible with the climate change statement and its inclusion is therefore unsound. Environmental legislation is likely to change and become more stringent in the coming years as climate change becomes an increasing concern, particularly after COP26 and the effects of climate change become clearer. The GNLP needs to take this into account for it to be sound.</p> <p>If public transport is non-existent, infrequent or cannot be provided to a good level, the sites should not be developed. Developments should not be based on a need for private car use and delivery van use. If the location of developments means that houses are at risk of flooding in the future, the site should not be developed. Sustainable suburban brownfield sites should be used rather than greenfield. The delivery of</p>	<p>An appropriate amount of housing growth is included in the plan in accessible locations to meet housing need identified through the standard methodology and to support sustainable economic growth. The strategy maximises the potential of brownfield sites.</p> <p>The strategy provides for housing need with a buffer to ensure delivery in relation to that need. If anticipated economic growth is not delivered, then the homes above the housing need will not be delivered as there will not be a market for them.</p> <p>The plan's policies as a whole provide for sustainable growth which, along with national measures on carbon reduction, are intended to contribute to meeting zero carbon targets.</p>	No change to the profile

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				49,492 new houses by 2038 is large and it is hard to see how the legally binding target of net zero by 2050 can be achieved with this level of development. The legal minimum number of houses should be the aim, with constant reviews of the situation.		
Housing, 54	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23615	Object	If Care Home bed spaces can also now be counted against housing need at a suitable discounted rate then why are they not included as are the new purpose-built student accommodation rates? Need to ensure compatibility with all measures and include both student accommodation and care homes as permitted.	In accordance with the Housing Delivery Test measurement rulebook and as stated at paragraph 54 of the GNLP strategy " <i>Care Home bed spaces can also now be counted against housing need at a suitable discounted rate</i> ". This approach has been taken in the GNLP.	No change to the profile
Housing, 56	Mr Trevor Bennett [14599]	23395	Object	This policy is unsound in that it assumes that the present policy is appropriate for the areas outside of Norwich. In recent years there has been an increase in privately rented properties with people buying houses for let at rates well above socially rented housing. This has created social and community problems. There needs to be more social rented properties in Broadland and South Norfolk.	Based on local viability evidence, policy 5 of the plan sets an affordable housing requirement of 33% to meet need. Updated evidence confirms that overall affordable housing needs will be addressed through implementation of the plan.	No change to the profile
Housing, 58	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	23664	Object	Paragraph 58 refers to local evidence and suggests that 28% of housing required from 2015 to 2038 should be affordable housing. However, there is evidence to later suggest that a policy of 40% affordable housing should be applicable outside of the Norwich Fringe Area. Welbeck Land support the identification within the Strategic Housing Market Assessment suggesting that around 3,900 additional communal establishment places for over 75s will be required to 2038.	Based on local viability evidence, policy 5 of the plan sets an affordable housing requirement of 33% to meet need, with a 28% requirement in the city centre. Updated evidence confirms that overall affordable housing needs will be addressed through implementation of the plan.	No change to the profile
Housing, 58	pal-planning ltd (Mr Peter Luder, Director) [19950]	23817	Object	Section 2 paragraph 58 needs to indicate whether "the highest requirement for general market housing is for 3 bed homes" is universally applicable across the GNLP area, or, whether it does not apply in Norwich City Centre, where demand for smaller units may be likely to be the largest group, as per Section 3 paragraph 135, which distinguishes Norwich City Centre. Section 2 paragraph 58 should be amended if it is the case that within Norwich City Centre, the highest requirement for	The profile is considered to be accurate in describing the highest need as being for 3 bed homes area wide. Policies in the plan provide for a range of homes to be delivered, including higher density development with smaller units in the city centre and other highly accessible locations.	No change to the profile

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				general market housing is not 3 bed homes, but, (if the case), smaller homes.		
Housing, 60	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	24286	Object	The published Central Norfolk SHMA, part 2 (chapter 8 of which addresses Housing for Older People) highlights that there is a structural inadequacy in suitable housing for the 'retirement+' market, with demand in 20 years expected to be as much as 5x the current provision. With purpose-designed and serviced housing it has been proven that independent living (providing higher levels of mental health and personal wellbeing) can be extended and supplemented by assisted living, so that nursing and elderly care requirements are contained to end of life. Revised Government policy/Guidance places an increased emphasis on this.	Allocations have been made for and including housing for older people and policy 5 allows for such accommodation to be provided on any housing site. Policy 5 also requires all major housing development to provide 20% of their homes to accessible and adaptable homes standards assisting in the provision of housing for the elderly and with specialist needs.	No change to the profile
The economy, 64	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	23665	Object	Welbeck Land supports the strategic employment sites and competitive land, and business lets that are identified within the Norwich and Wymondham areas, which support the globally significant growth axis in the Cambridge-Norwich Tech Corridor. Welbeck Land also supports the identification of Wymondham and the Hethel Engineering Centre, Browick Exchange, as part of the Cambridge-Norwich Tech Corridor.	The strategy provides for an appropriate amount of growth in Wymondham including the high levels of existing commitment.	No change to the profile.
The economy, 64 Digital Infrastructure, 92	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24207 24208	Object	Breckland District Council would welcome the earliest opportunity to engage with GNLP to explore the location and impact of any proposals in the Honingham Thorpe, Hethel and Silfield area on infrastructure including power and water as well as the impact on Breckland's communities living nearby and to work	Breckland and Greater Norwich LPAs have supported coordinated growth in the Cambridge Norwich Tech Corridor through various initiatives.  The issues of power and water supplies have been considered and are being addressed on an ongoing	No change to the profile

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				jointly to minimise any adverse effects which may arise as a result. However, the Council's main concerns are the cumulative impact of the growth on infrastructure particularly power which has been identified as a constraint in this area in the Greater Norwich Energy Study April 2019. Sufficient water resources both supply and waste management is also a concern as indicated in the Anglian Water Resources Management Study 2019.	<p>basis with the utilities providers (UK Power Networks and Anglian Water (AW)).</p> <p>This is being done through cooperative work which both Breckland and Greater Norwich are engaged in, including through the NSPF and the Cambridge Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of the utilities companies. AW is planning for water transfers from Greater Norwich to Breckland.</p> <p>New settlements are proposed through the GNLP for the next plan.</p> <p>The councils will work together, as per the emerging Statement of Common Ground, with the utilities providers to ensure that water and power needs are met and on co-operative work on new settlements.</p>	
Education and Social Mobility, 75	Mr Phil Gledhill [12749]	23277	Support	This growth particularly applies to large developments such as Long Stratton which currently has a large catchment area. However, when Long Stratton expands dramatically in housing numbers, will Bunwell still be allowed to send their children there if extra provision is not made at the High School?	Norfolk County Council plans for school expansion to meet growth needs. The adopted Long Stratton Area Action Plan includes expansion of the high school.	No change to the profile
Education and Social Mobility, 75	Mr Trevor Bennett [14599]	23396	Object	The County Council needs to be providing the schools that are needed for the communities. If they are only responding to new developments and waiting for houses to be completed there will always be overcrowding in schools. Aylsham needs a new primary school now, not when a development is completed. There needs to be a radical re-assessment of the provision of schools.	Norfolk County Council plans for school expansion to meet growth needs. An allocated site at Aylsham provides for a new primary school.	No change to the profile.
Education and Social Mobility, 75	Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]	23495	Support	The provision for sufficient new schools and additional places at existing schools needs to happen in advance of the housing development if overcrowding of classrooms and relocation of children to other schools is to be avoided. Long Stratton is a prime example of where there is to be significant new housing development and if local schools do not have capacity will children from outlying villages such as Bunwell be relocated to other schools? This must not happen.	Norfolk County Council plans for school expansion to meet growth needs. The adopted Long Stratton Area Action Plan includes expansion of the high school and a new 420 place primary school.	No change to the profile
Education and Social Mobility, 75	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23798	Support	Rackheath continues to be the focus of housing development and it is imperative that the bigger picture is considered. Educational capacity must be increased to ensure community can grow seamlessly and to ensure new developments integrate successfully.	Norfolk County Council plans for school expansion to meet growth needs. The adopted Area Action Plan includes school provision in Rackheath.	No change to the profile

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Education and Social Mobility, 75	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23897	Object	The questionable Rackheath North development has included plans for one new secondary school and two new primary schools. If this development does not go ahead or is changed significantly then where will these schools be located. There needs to be a plan as to where and when these new schools and further educational establishments will be built and who will fund them.	Norfolk County Council plans for school expansion to meet growth needs. The adopted Area Action Plan includes school provision in Rackheath.	No change to the profile
Education and Social Mobility, 75	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	24524	Object	It is noted that the GNLP will need to make provision for additional schools and school places to serve future growth. This approach is supported by Welbeck Land.	Support for additional school provision noted.	No change to the profile.
Infrastructure, 76	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24490	Object	We comment on clause 76 as background to our response on Transport Policy 4. A change suggested is that the statement, 'Historically relatively poor strategic infrastructure links limited growth in the area' is only partially correct and should read: "Whilst the strategic and local road network is largely in place, poor public transport and rail infrastructure limit accessibility to employment and essential services and discourage modal shift to sustainable transport modes".  It is the case that Greater Norwich has historically poor public transport and local rail infrastructure relative to other cities. This acts as a major constraint in trying to encourage modal shift to sustainable modes of transport and is a barrier for the significant percentage of households without private transport in	The suggested changes to the text in the profile are not considered to be necessary.  As this representation relates to many aspects of the GNLP, most significantly policy 1 on the growth strategy, policy 2 covering energy standards and policy 4 on strategic infrastructure, please also see responses to the representations on those policies.  In brief:  Strategic infrastructure policy 4 of the GNLP reflects existing and emerging national and Norfolk CC transport policy which aims to improve sustainable transport as well as strategic road and rail links.  The overarching strategy for the plan focuses the great majority of growth in our urban areas and large	No change to the profile

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				<p>endeavouring to access employment, education and other essential services.</p> <p>We disagree with the frequent and persistent claim that Norfolk is a poor relation in terms of the road network compared to the south-east and London. This is rolled out as 'evidence' that the local road network is holding back development and that further dualling of Norfolk's roads is essential for growth. This attitude has skewed the County's priorities and spending. (in 2016 Norfolk County Council voted spending on the Norwich Western Link, the 3rd Great Yarmouth River Crossing and the Long Stratton Bypass as the County Council's top spending priority for the future) and its transport agenda in favour of road building and accommodating travel by private car.</p> <p>A large body of academic research has challenged assumptions about the effects of new road infrastructure and economic growth (for example ); on how we cannot build our way out of congestion and on how optimistic traffic predictions can lead result in building surplus road space.</p> <p>Norfolk County Council has demanded much larger road schemes than necessary for addressing localised problems or for serving new development. For example, the A11/A47 Thickthorn Junction is a major project which Highways England acknowledges will increase carbon emissions. The Agency originally proposed a small scheme with the objective of assisting buses to negotiate the A11/A47 Thickthorn roundabout and serve new housing growth along the A11 corridor. Norfolk County Council lobbied for a major junction improvement with the aim of increasing road capacity and serving housing growth. To address the likelihood of an enlarged junction attracting single occupant car commuters travelling short distances, the Council proposes expanding Thickthorn park and ride. This mirrors the story at A47 Postwick Junction, where the County Council doubled the capacity of Postwick Park and Ride in 2014 on the back of Postwick Hub and ended up leasing unfilled spaces to Aviva at the adjacent Broadland Business Park.</p>	<p>villages. A limited amount of growth is focussed on village clusters to support the retention of services in those locations and to offer people the possibility of being housed locally.</p> <p>The climate change statement sets out broad ranged approach the GNLP takes to addressing climate change. Monitoring of this is linked to national targets providing flexibility as they are updated. The plan's policies as a whole provide for sustainable growth which, along with national measures on carbon reduction, are intended to contribute to meeting zero carbon targets.</p> <p>In line with the NPPF, the GNLP strategy takes account of the economic, social and environmental aspects of sustainability. It aims to significantly boost employment in businesses which can play an important role in tackling climate change locally, nationally and internationally.</p>	

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				<p>The County Council frequently cites the rural nature of Norfolk and reliance on the private car as a reason for road improvements. This argument is over-stated. A majority of the Norfolk population lives in Norwich, Great Yarmouth, King's Lynn and 21 market towns where there is considerable scope for people switching to active travel and public transport.</p> <p>An example of Norfolk's reliance on car use is Wymondham along the A11 corridor, nine miles from Norwich with direct rail links to Norwich and Cambridge. Census data (2011) shows that 22.1% of residents in Wymondham travel less than 2km (walking distance) to work and 30.2% travel less than 5km (cycling distance) to work. On the other hand, 71.8% of Wymondham residents (2011 Census), drive to work, mainly in Norwich. A conclusion of the market towns study is that travel pattern data shows the huge potential for a shift to active modes of transport for commuting.</p> <p>The GNLP Reg 19 would increase carbon emissions, contrary to the national legal target of net zero by 2050. The policy framework on climate change and local plans is addressed in the Centre for Sustainable Energy paper. Although climate change has been strengthened in the GNLP by the inclusion of a new climate change statement, it has been bolted onto to a previously prepared growth strategy and set of policies which are inconsistent with the statement and the evidence base on climate change. The GNLP is aware of this deficiency because they have agreed to review the Local Plan on climate change following its adoption.</p> <p>There are a number of matters which we consider to be unsound because they are incompatible with the duty to proactively contribute to the mitigation of, and adaptation to, climate change under section 19 (1A) of the Planning and Compulsory Purchase Act 2004 which requires Local Plans to include:</p> <ul style="list-style-type: none"> <li>• "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change"</li> </ul> <p>The matters include:</p>		

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				<ul style="list-style-type: none"> <li>• Absence of an overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008, supported by a strategy and policies in line with the carbon budget trajectory.</li> <li>• High housing number which will increase development pressures on greenfield sites;</li> <li>• Growth that includes dispersal of development to small villages which lack services and the possibility of new garden city settlements in open countryside distant from railheads (Thorpe Honingham, Hethel and Silfield).</li> <li>• Sub-optimal energy efficient standards and renewable energy generation</li> <li>• Lack of attention to retrofitting of historic development.</li> <li>• A transport strategy which would increase carbon emissions by catering for traffic growth and modest modal shift to bus, walking and cycling.</li> <li>• Inclusion of a Norwich Western Link.</li> <li>• Support for improvements to strategic highways.</li> </ul> <p>Several of these issues are addressed in the Reg 19 response by the Centre for Sustainable Energy which was commissioned by Norwich Green Party (on sustainable communities, zero carbon development, sustainable transport, renewable heating, renewable energy generation and retrofitting of traditional and historic buildings). We also endorse responses submitted by other parties who share the same concerns on a range of matters: CPRE, Norfolk Wildlife Trust, Wensum Valley Alliance, Dr Andrew Boswell and Client Earth.</p> <p>Norwich Green Party Group's representation mainly covers Transport Policy 4 which we consider to be unsound. We also make comments on a number of individual development sites: East Norwich, Anglia Square and on the smaller King Street Stores site. The changes to the Plan that we would like to see are those we have set out in our previous representations on Regulation 18. They include:</p> <ul style="list-style-type: none"> <li>• An overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008, supported by a strategy and policies in line with the carbon budget trajectory.</li> </ul>		

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				<ul style="list-style-type: none"> <li>• A lower housing number (42,568 dwellings plus a 5% buffer) resulting in lower development pressures on greenfield sites;</li> <li>• Growth concentrated in high density low car developments close to sustainable transport hubs, with a high concentration of growth located around Norwich.</li> <li>• No dispersal of development to small villages which lack services.</li> <li>• No new garden city settlements in open countryside distant from railheads (Thorpe Honingham, Hethel and Silfield).</li> <li>• Protection of Green Wedges around Norwich.</li> <li>• Development build to zero carbon standards that include renewable heating based on renewable energy generation</li> <li>• Retrofitting of historic development.</li> <li>• A transport strategy based on traffic reduction and a high degree of modal shift to bus, walking and cycling.</li> <li>• Abandonment of a Norwich Western Link.</li> <li>• No further major increase in road capacity.</li> </ul>		
The Road Network, 77	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	23668	Object	Welbeck Land acknowledge and support the identification of the A11 corridor as a major focus of growth, as is suggested in paragraph 77 of the GNLP Reg 19 document. The Cambridge[1]Norwich Tech Corridor is aiming to take advantage of the boost to economic development and will therefore need to be supported by the appropriate infrastructure being made available. It is noted, and supported, that significant grant funding has been secured to improve the cycle network in and around Norwich, as well as investing in other routes between Wymondham, Norwich, and Sprowston. The aim of continuing to promote public transport, and transport network growth, around areas such as Wymondham with its train station, is also supported by Welbeck Land.	Supportive comments about the strategy for growth are noted.	No change to the profile.
The Road Network, 83	Mr Graham Martin [19999]	24322	Object	In respect to housing numbers, many residents will recall David Cameron on BBC's Countryfile programme in 2012 stating, "Our vision is one where we give communities much more say, much more control. The fear people have in villages is a great big housing estate being plonked down from above". It is puzzling why developers are still making applications for more development and getting approval by	As this representation relates to many aspects of the GNLP, most significantly policy 1 on the growth strategy, policy 2 covering energy standards and policy 4 on strategic infrastructure, please also see responses to the representations on those policies.  In brief:	No change to the profile

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				<p>planners when there are some 31,452 un-built commitments in the GNDP area.</p> <p>The Colney Hall 0253 proposal should be removed from the proposed GNLP 2021. Colney Hall is outside the approved 2015 Local Plan limit of development and development would have significant negative impacts on protected landscapes. Colney parish objected to the inclusion of Colney Hall in 2018. Significant constraints have been identified under Housing and Economic Land Availability Assessment (HELAA). The proposal did not perform well scoring double negatives in a Sustainability Appraisal ( SA) The facility proposed in the GNLP 0253 is not required to be located near the research park. The 80 beds and 120 units of extra care housing is likely to add thousands more traffic movements on the B1108 an already congested road and would seriously impede through traffic to and from Norwich, UEA, the NNUH and the Research Park. BAW 2, Bawburgh and Colney Lakes, is allocated for a water-based country park. The 2009 Colney Parish Plan suggested a much less intrusive approach. Involving a network of circular walks linking the communities of Colney, Bowthorpe, Bawburgh, Hethersett, Little Melton, Earlham, UEA, NRP and the NNUH. The BAW 2 land should be part of a Norwich Greenbelt involving the Yare Valley and protected from significant development so that it is retained as protected green space. Incorporated could be the existing County Wildlife Sites, Local Nature Reserve and possibly GreenAcres and Colney Hall. This complex could form an important Wildlife Conservation Area with an information centre for the wellbeing of local communities</p> <p>Records indicate major flood events occurred in river systems in the Norwich area in 1770, 1784, 1878, 1912, 1947, 1968,1993 , 2015, 2018 and 2020. This suggests that there is less than a 30 year interval between major floods and this interval is decreasing . Planning applications often do not mention this. Even a 30 year interval would make many developments unsustainable and the applications should be refused. Climate change is likely to increase the frequency of such flood events. It would be informative if planners published information on the number and location of</p>	<p>The overarching strategy for the plan focuses the great majority of growth in our urban areas and large villages. A limited amount of growth is focussed on village clusters to support the retention of services in those locations and to offer people the possibility of being housed locally.</p> <p>Colney Hall is allocated as it will provide much needed housing for older people as part of an innovative programme which will promote active living.</p> <p>Flood risk has been a major consideration in determining the proposed location of growth.</p> <p>Strategic infrastructure policy 4 of the GNLP reflects existing and emerging national and Norfolk CC transport policy which aims to improve sustainable transport as well as strategic and more local road and rail links.</p> <p>Bawburgh Lakes are promoted as part of the Yare Valley green infrastructure corridor which provides opportunities for active travel and leisure, helps to manage flood risk and provides a landscape buffer for developed areas.</p> <p>The climate change statement sets out broad ranged approach the GNLP takes to addressing climate change. Monitoring of this is linked to national targets providing flexibility as they are updated. The plan's policies as a whole provide for sustainable growth which, along with national measures on carbon reduction, are intended to contribute to meeting zero carbon targets.</p> <p>In line with the NPPF, the GNLP strategy takes account of the economic, social and environmental aspects of sustainability. It aims to significantly boost employment in businesses which can play an important role in tackling climate change locally, nationally and internationally.</p>	

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				<p>flooded properties in their area in the last 50 years and the dates when these properties were built.</p> <p>As to the Norwich Western Link such a major piece of infrastructure needs to be tested for compliance with climate change policies and carbon footprint. If a Norwich Western Link (NWL) is thought necessary it is not clear to many people why Option C was chosen by Norfolk County Councillors when a much cheaper and less environmentally damaging Option B (West) route is available.</p> <p>The GNLP Reg 19 provides no effective modelling of baseline carbon emissions for the plan area and how to reduce them by 2038. A clear process needs to be included on how to assess and monitor carbon emissions so that progress, or lack of progress, can be monitored and publicised so that effective mitigation actions can be taken. Planning and Compulsory Purchase Act 2004 requires, by law, robust climate change policies in local plans. Local Plans must also be in line with the objectives and provisions of the Climate Change Act 2008. The "Climate Change Statement" at Reg 19, 157, does not constitute a holistic strategic policy on climate change and the reduction of carbon emissions.</p>		
The Road Network, 83	Broadland Green Party (Jan Davis, Coordinator) [19650]	24485	Object	No issues raised?	No issues have been raised in the representation.	No change to the profile
The Rail Network, 84	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23902	Object	<p>I see no mention of the use of sustainable drainage systems (SuDS) to provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses. Local landowners and farmers are concerned about the water stress that large developments will cause as they struggle to provide water for their agricultural crops in competition with homeowner domestic needs.</p> <p>Local residents in the North East Growth area will know that the current flooding causes chaos after a period of heavy rain as the natural environment continues to be covered in tarmac that prevents natural drainage and causes sever rain water run-off. I would like to see some acknowledgement of this and</p>	Policy 2 requires the use of SuDs in new development. Para. 102 of the profile refers to the plan promoting <i>development which supports more natural functioning of the water environment</i> which covers the requirement for SuDS in policy 2.	No change to the profile

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				confirmation of the use of SuDS in these plans. I would also like to see some affirmation from the NFU, or another similar professional body, that the needs for farmers have been taken into consideration.		
The Rail Network, 85	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24491	Object	The local rail network around Norwich is limited compared to new rail infrastructure around Cambridge where Cambridge North station has been built to serve major growth close to the city and Cambridge South station is planned. Whilst the GNDP has devised the concept of a Norwich - Cambridge Arc, Norwich is the poor relation in terms of sustainable transport infrastructure.	Policy 4 promotes the enhancement of both the local and strategic rail services.  The Cambridge Norwich Tech Corridor is a recognised regional initiative which also seeks enhancement of rail services.	No change to the profile
The Cycle Network, 88	Mr Trevor Bennett [14599]	23282	Object	It is an exaggeration to state that there is a good network of cycle links to Norwich. The Marriot's way is both a good cycle track and footpath, but it is not an adequate route into Norwich from the North of the County for people wanting to cycle to Norwich for work. If there is to be any further development to the North of Norwich as proposed at Aylsham there needs to be investment in a suitable cycle path from Aylsham to Norwich	As a strategic plan, Policy 4 of the GNLP promotes development of the cycle network. Emerging studies on the network will inform where improved facilities will be provided, in addition to those provided as a part of new development..	No change to the profile
The Cycle Network, 88	Mr Jeremy Barlett [19588]	23617	Object	It is not true to say that there is a good network of cycle routes in Greater Norwich. The plan needs to reflect the true situation - cycle routes are often poor and new developments have not made them any better (and sometimes worse). Because Marriot's way is busy, shared with pedestrians and not very well surfaced west of Hellesdon it is not a fast or efficient route in or out of Norwich. Radial routes especially to the north and east of the city and ring road either have no cycle provision or totally facilities. Examples: (1) Spixworth Road - narrow shared cycle & footpath. (2) On-road cycle path on St. William's Way is normally blocked by parked cars from Norwich Car Centre. (3) Busy stretches of ring road such as Sweetbriar Road are very unpleasant to cycle on and avoiding them requires a lengthy detour. (4) Very few safe places to cross NDR - traffic is fast moving and crossing at points provided requires extreme care and a certain amount of luck. Grant money has been badly spent in many cases, such as Tombland and Earlham Road/West Pottergate junction.	As a strategic plan, Policy 4 of the GNLP promotes development of the cycle network. Emerging studies on the network will inform where improved facilities will be provided, in addition to those provided as a part of new development.	No change to the profile

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The Cycle Network, 88	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23799	Support	<p>Connectivity of infrastructure needs to be addressed. In Rackheath, footpaths around the village do not currently link up well and access to neighbouring villages, communities and facilities is difficult. E.g.</p> <ul style="list-style-type: none"> <li>• no safe footpath to Salhouse or Salhouse Station.</li> <li>• no footpath/cycle path connectivity to Great Plumstead.</li> <li>• no footpath/cycle path available to Sprowston and on to Norwich</li> </ul> <p>Whilst “leisure routes” in the green corridors are being addressed, these are not necessarily suitable for commuting and only run parallel to the NDR and do not follow the spine roads into Norwich and other employment sites.</p>	As a strategic plan, Policy 4 of the GNLP promotes development of the walking and cycling networks. The adopted Growth Triangle AAP will provide improvements to the network in the Rackheath area. Emerging studies on the networks will inform where further improved facilities will be provided.	No change to the profile
Transport for Norwich and the Transforming Cities Programme, 89	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23804	Support	Direct, fast routed public transport to Norwich and the Wroxham should be in place early 2021 to ensure developments can be sustainable and to meet climate change objectives – we must promote the use of public transport to our existing community and to those moving into new developments.	Reflecting existing and emerging transport policy, the Wroxham Road corridor is identified in the GNLP as a strategic bus corridor. The adopted Growth Triangle AAP supports improvements to the public transport network in the Rackheath area.	No change to the profile
Transport for Norwich and the Transforming Cities Programme, 89	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24492	Object	In relation to para 89, Transport for Norwich and its predecessor, the Norwich Area Transportation Strategy Implementation Plan (NATS 2013), based around modal shift to bus, walking and cycling, have been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike. Bus service improvements have also been achieved but the Councils are a very long way from delivering an upgraded bus infrastructure plan based on six corridors for the Norwich built up area as promised by the Joint Core Strategy. An application was made to the Transforming Cities Fund for between £74m to £127m for bus infrastructure schemes. Norfolk County Council was awarded £32m and currently, no other sources of funding have been identified.	Strategic infrastructure policy 4 of the GNLP reflects existing and emerging national and Norfolk CC transport policy which aims to improve sustainable transport as well as strategic road and rail links.	No change to the profile

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Emissions and Climate Change, 93	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24493	Object	<p>Although the GNLP has been strengthened by a stated objective to reduce per capita emissions and contribute to meeting the national target to achieve net carbon zero by 2050, the strategy for growth and supporting policies are not in line with S19 (1A) of the Planning and Compulsory Purchase Act 2004.</p> <p>In 2021, government will set the level of the sixth carbon budget, covering 2033 to 2037. This will require faster progress in reducing emissions as the UK emissions are currently projected to exceed the legally binding 4th and 5th carbon budgets for the years 2023 to 2027 and 2028 to 2032. The Committee on Climate Change is advising that the UK set its sixth Carbon Budget to require a 63% reduction in emissions across all sectors including international aviation and shipping between 2019 and 2035 (a reduction in UK of emissions of 78% by 2035 relative to 1990). The GNLP Plan period 2018 – 2038 will be a critical period for local councils to contribute to net zero greenhouse gas emissions by 2050 and hence the vital importance of crafting and adopting a Local Plan which meets the challenge.</p>	<p>The climate change monitoring in the plan uses the government's annually produced data for each of the 3 districts. This is the standard data source used nationally. It provides the most effective and comparable information. The targets in the plan and intentionally linked to those of the government to reflect the fact that:</p> <ol style="list-style-type: none"> <li>1.National targets regularly change so it is appropriate that GN should contribute to those national targets and those targets are updated when they change prior to adoption;</li> <li>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</li> </ol>	No change to the profile, although minor modifications will be included elsewhere in the plan to reflect changes to national carbon reduction targets.
Emissions and Climate Change, 94	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24494	Object	<p>Although nitrogen dioxide levels have been falling in the AQMA, breaches continue, notably on Castle Meadow, the main bus corridor. Particulate matter pollution is an even more serious concern. Fine particulate matter (PM2.5) has been shown to affect every organ in the body. The WHO has set a limit for PM2.5 at 10mcg/m3 whilst recognising that there is no healthy limit. In Norwich, where road traffic is a major pollutant source, a study by Public Health England attributed 5.5% of deaths of people aged 25 and over in 2010 to PM2.5. Although PM2.5 levels have fallen slightly in Norwich, they remain above the WHO limit in the city and just below the WHO limit in suburban and rural parts of Greater Norwich. Electric cars would not avoid the friction of rubber tyres and brakes on road surfaces, a major source of PM2.5.</p>	<p>Strategic infrastructure policy 4 of the GNLP reflects existing and emerging Norfolk CC transport policy which aims to improve sustainable transport as well as strategic road and rail links.</p> <p>The text in the profile of this strategic plan recognises that there is more work to be done on improving air quality in the city centre. Measures to address air quality in the designated AQMA are set out and updated in dedicated reports on this issue.</p>	No change to the profile
Emissions and Climate Change, 95	Mr Phil Gledhill [12749]	23278	Support	<p>Initiatives such as Cluster Villages are designed to reduce reliance upon vehicle use for primary school trips. However, in reality this could prove of negligible benefit given many currently living near the schools still use the car. Non Cluster Villages will be starved of new housing and expansion opportunities. With electric car</p>	<p>The strategy aims to provide appropriate amounts of growth to support retention of services in rural areas including schools. Policy 2 requires new development to provide for new and changing technologies including electric vehicles.</p>	No change to the profile

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				sales increasing significantly at last we need to see new initiatives now such as the compulsory installation of vehicle charging points in new houses. This particularly applies to rural areas where plug-in hybrids are a sensible option given greater distances travelled.		
Emissions and Climate Change, 95	Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]	23496	Support	In theory the Cluster Village plan makes sense but the reality is that many parents, even those living near to schools, continue to use their vehicles for dropping off and collecting the children, particularly in bad weather or if they have jobs to go to. New houses surely must now have car charging points to encourage the purchase of eco-friendly hybrid and all electric vehicles which will also make housing development in non-cluster villages agreeable for the longer term.	The strategy aims to provide appropriate amounts of growth to support retention of services in rural areas including schools. Policy 2 requires new development to provide for new and changing technologies including electric vehicles.	No change to the profile
Emissions and Climate Change, 95	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24495	Object	Data on per capita emissions (from transport, domestic dwellings, commercial/industrial settings), collected by the Department of Business, Energy and Environmental Strategy excludes emissions from international aviation, shipping, production and consumption. Consequently, per capita emissions are higher than presented by official figures and radical cuts will be required to achieve Net Carbon Zero. At the present rate of carbon emissions, the Tyndall Centre for Climate Change Research using Scatter (a carbon footprint tool to reduce city-level emissions) estimates that Norwich will use up its global carbon budget within around seven years. The City must cut its carbon emissions by 13% every year to meet its contribution to Net Zero. Broadland and South Norfolk with their higher emissions from road transport must make an annual cut of 13% and 14.25% respectively.	The climate change monitoring in the plan uses the government's annually produced data for each of the 3 districts. This is the standard data source used nationally. It provides the most effective and comparable information. The targets in the plan and intentionally linked to those of the government to reflect the fact that:  1. National targets regularly change so it is appropriate that GN should contribute to those national targets and those targets are updated when they change prior to adoption;  2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.	No change to the profile
Emissions and Climate Change, 96	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24496	Object	Information should be included on the implications of changes in temperature and precipitation. These include impacts on human, plant and animal health, with implications for food production, water supply, infrastructure, public health and education. The National Trust has mapped the various effects of climate change in England and Wales between 2020	The profile provides a concise summary of the broad range of issues that planning can have an influence on which affect Greater Norwich. In using research by UEA quoting Met. Office projections which has been produced for New Anglia LEP, the coverage of likely changes in the area resulting from climate change is regarded as sound. Measures to address	No change to the profile.

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				and 2060 and shows major overheating across the whole of the south east and east of England by 2060.	overheating in the design of new development are required by policy 2.	
Emissions and Climate Change, 97	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23776	Support	The NPPF 118(b) states that the plan should “recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;”. This paragraph doesn’t specifically state that the carbon balance of developments should be considered but 148 in the plan does say that the plan should “shape places in ways that contribute to radical reductions in greenhouse gas emissions...”.	Support noted	No change to the profile.
Emissions and Climate Change, 97	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23906	Object	Broadland District Council commissioned the exemplar houses in Trinity Close, Rackheath which were designed to the highest sustainability level. They have however proved to be an economic disaster with the extra greening increasing the average build cost considerably. In addition local residents complained of excessive heat in the summer, issues with air source heat pumps and the failure of grey water flushing. I would like to see what lessons learnt have been applied to from these exemplar homes and how planners are going to insist of carbon neutral housing whilst still delivering an economical model making it attractive to developers.	Policy 2 of the plan sets policy requirements for water and energy efficiency. The latter standards seem likely to be superseded by higher national standards through the changes to the Building Regulations. Capacity and skills for building to high energy standards is improving locally and nationally year on year.	No change to the profile
Flood Risk, 98	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23908	Object	I see no mention of the use of sustainable drainage systems (SuDS) to provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses. Local landowners and farmers are concerned about the water stress that large developments will cause as they struggle to provide water for their agricultural crops in competition with homeowner domestic needs.	The profile refers to the importance both of the plan requiring sustainable drainage and water efficiency in new development. SuDS measures are required by policy 2 of the plan, which also sets the highest permissible standards for water efficiency.	No change to the profile
Flood Risk, 98 Flood Risk, 99 Flood Risk, 100 Flood Risk, 101	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781] Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	24497 24498 24499 24500 24501 23943	Object	Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas. For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the	The profile is concise so does not go into detail about different sources of flooding. The plan is informed by a Strategic Flood Risk Assessment which identifies flood risk zones and areas taking account of all sources of flooding which covers climate change implications. Updated mapping will be used in assessing planning applications as it is provided over time.	No change to the profile.

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Flood Risk, 102  Flood Risk, Map 3 Fluvial and Tidal Flood Zones				Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.		
Renewable Energy, 103	Mr Phil Gledhill [12749]	23279	Support	As a region we should be promoting the benefits of a medium to long term hydrogen strategy/infrastructure for buses, trucks and aviation. A significant amount of heavy transport operates within and through Norfolk and we should be leading the way. We also have plenty of water on 2 sides of the county, a huge component in its production.	Policies 2 and 4 of the plan allow for and support the growth of new technologies including hydrogen vehicles and power.	No change to the profile
Renewable Energy, 103	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23354	Support	Minor points for you to consider. In regard to para 103, should this also refer to off shore wind's on-shore infrastructure?	The profile is concise. Onshore infrastructure for onshore wind is felt to be covered by the existing wording.	No change to the profile
Renewable Energy, 103	Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]	23501	Support	Cost effective and efficient means of supplying energy must be considered for the short, medium and long term. Wind farms and solar panels are not visually appealing and are expensive given production/installation costs, subsidies, back-up requirements and relative lifespan. Other energy sources such as hydrogen fuel cells are a good long term option for light/heavy transport, aviation and shipping and while currently expensive to produce, they offer great long term opportunities, particularly for a region with the sea on two sides, a huge component in hydrogen production. A combination of all energy sources is the longer term way forward.	The profile and the policies in the plan are worded to encourage decentralised, renewable and low carbon energy sources, recognising that technologies will change over time.	No change to the profile

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The Built and Historic Environment, Table 3 - Numbers of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23956	Object	Alongside paras 104-107 and Table 3, please add a sentence in relation to heritage at risk and also historic landscape characterisation.	Although not considered necessary for the soundness of the plan, a minor modification should be made for clarity to refer to heritage at risk and historic landscape characterisation in the profile.	Make a minor modification to amend para. 107 so that it reads:  In total, there are around 5,800 listed buildings and 90 conservation areas. Scheduled Monuments, significant archaeological potential <b>and historic landscape character, as defined in assessments</b> , add further layers to this historic character. <b>It is important that the plan has policies to protect and enhance heritage, including heritage at risk.</b>
The Natural Environment, 108	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23643	Support	Many of the protected sites have already been adversely affected as a result of nutrient loading from a variety of sources both diffuse and point. The challenge is to remove the adverse impact, not add to it.	Support noted	No change to the profile.
The Natural Environment, 109	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23644	Support	Water quality is one of two factors influencing natural functioning of protected wetland sites. The other factor is water availability. Both of these factors if adverse can impact protected wetland sites both alone and in combination. Many protected sites and water bodies are in unfavourable condition as a result of decades of pollution combined with adjacent abstraction. These activities have already taken the ecology of these sites and their species far away from a natural state.	Support noted. The profile and the plan encourage water efficiency which influences water availability. Water quality is regarded as being adequately covered in para. 109.	No change to the profile.
The Natural Environment, 109	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23777	Support	We are pleased that this paragraph now mentions protecting Water Quality in SACs and habitats sites.	Support noted.	No change to the profile.
The Natural Environment, 109	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24468	Object	This rep. is the same as rep. 24470 below	See response to rep. 24470 below	See response to rep. 24470 below

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The Natural Environment, 112	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23778	Support	In relation to para 112, this new paragraph has removed mention of natural capital as far as we can see. The paragraph does not mention of natural functioning of ecosystems which would be beneficial.	Although it is not considered necessary for the soundness of the plan, and the profile is intended to be concise, it is accepted that an additional clause in para. 112 on the enhancing natural capital and the natural functioning of ecosystems would provide clarity.	Make a minor modification to add a clause to para. 112 so that it reads:  Long-term work is ongoing to improve and expand the green infrastructure network throughout Greater Norwich and beyond. Green infrastructure is vital to supporting biodiversity, <b>enhancing natural capital and assisting the natural functioning of ecosystems</b> , combating climate change, reducing pollution, helping to create attractive homes and workplaces, enhancing landscapes, reducing flood risk and aiding active lifestyles and wellbeing.
The Natural Environment, 112	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23862	Support	In relation to para 112, this statement fails to mention the role of GI in mitigating the impacts of recreation and visitors on more sensitive protected sites.	The profile is concise and the impacts of recreation and visitors on more sensitive protected sites are regarded as having been covered elsewhere in the profile.	No change to the profile
The Natural Environment, 112	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24469	Support	This representation is the same as rep. 24470 below	See response to rep. 24470 below	See response to rep. 24470 below
The Natural Environment, 115	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23779	Support	We find this paragraph sound but raise the following comments. We are pleased that our previous comments to paragraph 110 at the time have partially addressed this in new paragraph (115). However, it appears that there is some confusion between green infrastructure and natural habitats. NPPF 171	Support noted. Although it is not considered necessary for the soundness of the plan, and the profile is intended to be concise, it is accepted that an additional clause in para. 115 on a network of habitats would provide clarity.	Make a minor amendment to the first sentence of para. 115 so that it reads:

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				keeps the two concepts separate “take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.” We would reiterate that green infrastructure is not necessarily biodiverse and may not include different habitats (e.g. farmland and playing fields).		Overall, the plan should promote the protection, enhancement and delivery of <b>a network of habitats</b> and a strategic green infrastructure network which addresses the scale of development proposed in the plan.
The Natural Environment,	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24470	Support	<p>‘The natural environment’ section needs to be improved and expanded as it currently is unclear or incomplete. It needs to recognise and include the issues that the natural environment, both within and adjoining the Plan area, is facing including biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed Plan may impact on and address these issues. Currently, it could be read as the only issues facing our natural environment are those identified under (109), which is clearly not the case.</p> <p>In (109) the Plan needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but a wide range of other sites that are important for wildlife, including County Wildlife Sites (CWS) (locally protected sites).</p> <p>We welcome the amendments and additions, respectively, to (112) and (115) which help to recognise that the protection and delivery of quality GI is key to delivering many of its objectives and growth cannot be regarded as being sustainable without this.</p>	Support noted. Although it is not considered necessary for the soundness of the plan, and the profile is intended to be concise, it is accepted that an additional sentence at the end of para. 109 on locally protected habitats would be helpful.	<p>Make a minor modification to add a sentence at the end of para. 109 to read:</p> <p><b>It is also important that locally designated habitats are protected and enhanced.</b></p>
Landscape , 117	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24502	Object	We strongly endorse CPRE’s case made for a Green Belt for Norwich based on a Green Wedges principle.	Regulation 18 included consultation on the potential for a Green Belt. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. The NPPF makes it clear that new Green Belts should only be established in exceptional circumstances. Establishing a new Green Belt at this stage would reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.	No change to the profile
Landscape , 118	Mr Phil Gledhill [12749]	23280	Support	Norfolk has exceptional, far reaching landscapes but very few are protected as we would like. Local authorities and Government must be vigilant in the thoughtful and careful siting of developments going forward including housing and commercial and in	Support noted.	No change to the profile

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				particular avoiding land windfarms which are noise intrusive and unsightly on any landscape, particularly a flat one.		
Landscape , 118	Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]	23510	Support	We fully support the view that our valued landscapes must be protected but some are not as we would like. Solar energy farm installations on arable land seem a questionable alternative to food production in addition to not being attractive. Wind farms are not at all appealing to the eye and are a noise intrusion for local houses. Extreme care must continue with the siting of new housing developments, large and small and to consider and avoid any loss of view for local residents and the village as a whole when alternative, less intrusive options are available.	Support noted. The plan provides the framework for landscape protection and enhancement.	No change to the profile
Landscape , 118	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23805	Support	Landscape buffers should be protected and retained, including tree belts and woodland.	Support noted. The plan provides the framework for landscape protection and enhancement.	No change to the profile
Soils, 119	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23645	Object	Soils within the landscape are important for practices other than agriculture. The suggestion from this section of the plan is that agriculture is the only activity where soil condition is relevant. This isn't the case. The plan needs to cover other land use categories, where soil is an important resource. For example peat soils are valuable in providing habitat for protected species and habitats, they also capture carbon and offset the impact of climate change. These peat soils also provide a growing medium for plants such as reed and sedge which are harvested. Often mismanagement of 'tilled soils' leads to an adverse impact on other soils types through sediment and nutrient loading. The range of soils types and their juxtaposition makes the overall landscape and the character types unique and special and makes the GNA what it is.	The profile is concise. It is felt that the current text adequately covers this point.	No change to the profile
Water, 120	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23780	Support	There is no information about WFD and risk to water quality. Regarding paragraphs 120 to 122: While we are finding this paragraph sound we do have some concerns. We have gone into more detail in this in our responses to policies 3 and 4.  The water section paragraph includes 3 paragraphs. 2 of these are about drinking water and only one (paragraph 122) with any mention of pollution. There is no information about WFD and risk to water quality.	Support noted. Since the profile is concise and water quality is covered in para. 109, no additional text is regarded as being needed here.	No change to the profile

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>It is disappointing none of our previous suggestions have been added here and, no links made to risk from development, or that preventing deterioration as part of WFD is not an 'aim' is a requirement.</p> <p>The Local Plan must highlight WFD and links to water quality - it is statutory environmental legislation and should be referenced in the environment section. The "water" section (para 120-122) is sparse and there is required to acknowledge potential risks to the water environment from growth pressures. There is no mention of waste-water issues and infrastructure.</p>		
Water, 121	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23646	Object	<p>The statement is inaccurate and biased suggesting agricultural activities are the cause of drought stress. The scale of abstraction to provide water for households and businesses is a key part of the puzzle and needs to be recognised in this part of the plan. It is the in-combination impact of a misuse of and a lack of respect for the water resource combined with natural climatic conditions that explains why the region is under severe drought stress.</p>	The current wording is considered to be appropriate.	No change to the profile
Water, 122	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23864	Support	<p>Reference could be made to natural water management and the positive role that habitat could have on helping to balance the water demand.</p>	Support noted. The issue is covered in para. 109.	No change to the profile

### Section 3 – The vision and objectives for Greater 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
Section 3 - The Vision and Objectives for Greater Norwich, 123	Mrs Janet Skidmore [19326] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23497	Object	No modifications required to the Vision and Objectives.  Request that:  modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance;  an additional allocation or contingency site is identified at Wymondham at land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320).	No change to the V + O requested.	No change to the V + O  No change elsewhere in the plan to increase Wymondham housing numbers or add Gonville Hall Farm site
Section 3 - The Vision and Objectives for Greater Norwich, 123	David Lock Associates (Heather Pugh, Partner) [20014]	24452	Object	Support the overall principles and statements of intent set out in section 3 but:  'Disconnect' between these statements and plan strategy and allocations.  A new settlement or garden village better than 'edge of settlement piecemeal growth' to achieve net zero carbon emission development	No change to the V + O requested.	No change to the V + O  No change elsewhere in the plan to replace sustainable urban extensions with new settlements. New settlements are proposed for the next plan.
The Vision for Greater Norwich in 2038, 125	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23957	Object	Changes in vision text required to replace historic <b>assets</b> with <b>environment</b> .	No changes are required for soundness, however the GNLP authorities accept that minor modifications should be made for clarity.	Make a minor modification to change the final sentence of para. 125 to <i>"Growth will make the best of Greater Norwich's distinct built, natural and historic environment, including protecting and enhancing them."</i>
The Vision for Greater Norwich in 2038, 125	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24514	Object	Changes in vision text required to better balance between the 3 pillars of sustainable development by adding " <b>whilst protecting and enhancing them</b> " at the end of para 125.	No changes are required for soundness, however the GNLP authorities accept that minor modifications should be made for clarity.	Make a minor modification to change the final sentence of para. 125 to <i>"Growth will make the best of Greater Norwich's distinct built, natural and historic environment, including protecting and enhancing them."</i>
The Vision for Greater	Centre for Sustainable Energy (Daniel	23938	Object	The Vision for Greater Norwich in 2038 and the Objectives within the plan should be updated to incorporate reference to the 2050 commitment to	The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:	Make a minor modification 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
Norwich in 2038, 126	Stone, Project Manager) [19972]			<p>become net zero carbon by 2050, and in particular to the interim 2030 carbon reduction commitment (-68%). It should also acknowledge the implications of these commitments for planning within your district, which are extremely significant. It should also summarise the duties around carbon auditing and budgeting early and prominently within the plan, to set the context for the policies which follow. The commitment to reduce emissions to nothing within 30 years needs to influence all policies, and all policies should be assessed for compliance against this overarching objective.</p> <p>The Greater Manchester Spatial Framework approaches this well, page 76 – 78 and Policy GM-S 2, though Greater Manchester are committed to carbon neutrality ahead of the 2050 deadline, in line with their Climate Emergency Resolution. This is based on analysis carried out by the Tyndall Centre which considers baseline emissions and sets a carbon budget in line with the Paris Climate Accord, and a 2038 target for carbon neutrality.</p> <p>We make the following comments and suggestions about the following objectives on page 39 of the draft plan:</p> <p>The economy objective should be more explicit about the objective carbon emission reductions which are required by national legislation.</p> <p>We recommend that your objective in relation to infrastructure provision is strengthened to reflect the scale of infrastructure provision required to deliver a zero carbon future, and the scale of the transport modal shift required for a net zero future, reflected in the governments decarbonising transport strategy and the Prime Minister’s 10 point plan for a green industrial revolution</p>	<p>1.National targets regularly change so it is appropriate that GN should <b>contribute to</b> those national targets and those targets are updated when they change prior to adoption;</p> <p>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be <b>contributed to</b> by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement and reflected in the V + O.</p> <p>It is accepted that a minor modification should be made to update the national carbon reduction targets to reflect the government’s changes made in April 2021.</p>	<p>change para 150 of the V + O (and other appropriate parts of the plan) to <i>Critically, our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national target to <b>reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and the zero-emission target by 2050.</b></i></p>
Economy, 127	Mr Robert Towns [19798]	23291	Object	<p>Lack of consultation on the proposed additional housing in Aylsham affecting property, ruining countryside views and spoiling the local area. Aylsham is a small town with very little infrastructure to cope with this additional housing.</p>	<p>No change to V + O requested.</p> <p>The overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage.</p> <p>See responses to Policy 1 and 7.2 for further information on Aylsham.</p>	<p>No change to V + O</p> <p>No change elsewhere in the plan to reduce Aylsham housing numbers or amend sites.</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
Economy, 127	Sirius Planning (Miss Francesca Wray, Project Planner) [15640]	24300	Object	There is no reference in the vision, or policies, to the rural economy outside settlement boundaries and within the countryside. This is not consistent with the NPPF. The Local Plan needs to consider the vitality and economy of rural areas needed for rural communities to boost rural economic growth. The Vision should be strengthened to include the importance of the rural economy within the countryside.	The vision is in line with national policy in generally protecting open countryside from development, whilst promoting some growth in and on the edge of villages to support vitality.	No change to the V + O
Economy, 128	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24209	Object	Have any synergies been considered with Snetterton Heath business park with businesses in green energy technology, transport & warehousing, digital industries?	These synergies have been considered, in particular through the promotion of the strategic employment sites, a number of which have specialist functions, in the Cambridge Norwich Tech Corridor, as supported by both Breckland and Greater Norwich LPAs through various initiatives and the NSPF and referenced in para. 129 of the V + O.  The councils will work together, as per the emerging Statement of Common Ground, to ensure that economic synergies are explored further in the future.	No change to the V + O
Economy, 131	Mr Andrew Cawdron [12806]	24421	Object	The vision of the GNLP includes the statement at paragraph 131 that "our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national zero emission target by 2050." Where is the evidence of this? Whilst the GNLP Climate Change Statement states that it will "have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks", it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations .  There is no mention of the December 2020 target announced by the Government for a carbon emissions reduction of at least 68% by 2030 compared to 1990 levels. Carbon emission reductions for the three Authorities from 2005 to 2018 (UK local authority and regional carbon dioxide emissions national statistics: 2005-2018) were: Broadland - 23% reduction (1.77% average annually) Norwich - 42% reduction (3.23% average annually) South Norfolk - 20% reduction ( 1.54% average annually) The data from 2005 would suggest that Broadland and South Norfolk will need to accelerate the speed of	The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:  1.National targets regularly change so it is appropriate that GN should contribute to those national targets and those targets are updated when they change prior to adoption;  2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement and reflected in the V + O.  It is accepted that a minor modification should be made to update the national carbon reduction targets to reflect the government's changes made in April 2021.	A minor modification is proposed to para. 150 to include new national carbon reduction targets as per response to rep. 23938 above.

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>reduction to 2030 if they are to meet this Government target.</p> <p>It is acknowledged that rural areas have higher levels of emissions than the national average which may require stricter measures and which should be addressed in the plan. Both Broadland and South Norfolk have recorded slight increases in carbon emissions between 2005 and 2018 for transport. Transport emissions are a critical area which needs to be addressed, particularly noting that transport is 36% and 53% of the total emissions for Broadland and South Norfolk respectively against the national average of 36%.</p> <p>There are no specific proposals in the GNLP outlining how this carbon emissions imbalance from transport will be resolved or that levels will not be further increased by the location proposals for housing and employment in the plan. It is inevitable that the site allocations will increase transport use rather than encourage a modal shift to other forms of transport as is the stated ambition of the GNLP.</p> <p>Reliance on the switch to electric vehicles for transport emission reductions will assist over the longer term, but this will still be partial up to 2030 . Volumetrically, housing placement on GNLP sites will lead to larger traffic quantity and pressure on all county road infrastructure.</p>		
Communities, 132	Mr Robert Towns [19798]	23292	Object	<p>People of all ages will not have access to good facilities. In particular, the growth proposed for Aylsham does not provide for additional doctors, supermarkets or high schools.</p>	<p>The objective is valid. Evidence studies have engaged with relevant providers to identify the need for additional infrastructure and services to meet the proposed growth needs and included these in the plan.</p>	No change to the V + O
Communities, 132	Mr Trevor Bennett [14599]	23347	Object	<p>This aim does not appear to apply to Aylsham. The schools are full, the health care services are inadequate and effectively less than 1981 when the population was below 5,000, as against a population of over 8,000. The road network based around a late medieval road network did not cope pre-covid and parking is a real problem.</p>	<p>The objective is valid. Evidence studies have engaged with relevant providers to identify the need for additional infrastructure and services to meet the proposed growth needs and included these in the plan.</p>	No change to the V + O
Communities, 132	Mr Trevor Bennett [14599]	23448	Object	<p>This strategy does not apply to the market towns of the Greater Norwich area or even the villages that are supported by these towns. By significantly increasing the numbers of new homes in the market towns it will mean that people will struggle to have good access to services and facilities" due to the large increase in the population, without commensurate increase in the infrastructure needed to meet the need. The strategy is not sound when put alongside the increase in new homes from Reg.18 to Reg.19. and the resultant increase in car use.</p>	<p>The objective is valid. Evidence studies have engaged with relevant providers to identify the need for additional infrastructure to serve the proposed growth and included these in the plan, with updates considered for those locations where additional homes have been included between Reg. 18C and 19.</p>	No change to the V + O

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Communities, 132	Ms Catherine Maclennan [19876]	23461	Object	I believe that this plan is not legally compliant because of the lack of consultation. I believe that the period of time for public consideration and reduced. discussion has been reduced. The fact that this decision was made in the absence of opposition councillors has resulted in the process appearing underhand and unreliable There is an unprecedented situation of a global pandemic that has resulted in obvious restrictions on social interaction and movement, it would appear that Broadland Council have exploited this situation to prevent transparency and the democratic process.	It is not clear what specific lack democratic oversight the representation refers to. The Regulation 19 plan has been considered through the appropriate and required democratic processes consisting of the GNLP, and at each local authority, including member panels and the Cabinet at Broadland.	No change to the V + O
Communities, 132	Sport England (Mr Philip Raiswell, Planning Manager) [13516]	23604	Support	Support the development of sustainable communities with good access to open space, sports facilities, and better opportunities to enjoy healthy and active lifestyles.	Support noted.	No change to the V + O
Communities, 132	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23730	Object	The allocation of two sites in Aylsham contradicts para. 132 which states that new communities “will be reasonable and sustainable communities” and “well integrated with our existing communities”. To increase the number of homes in Aylsham in a short space of time by more than 15% will mean this objective cannot be met.	Evidence studies have engaged with relevant providers to identify the need for additional infrastructure to serve the proposed growth and included these in the plan, assisting the integration of existing and new communities.	No change to the V + O
Communities, 132	Mr Richard Taylor [19828]	23736	Object	The scale of growth proposed at Key Service Centres against residents' wishes at distance from jobs and travel infrastructure such as Reepham is unsound.	The proportion of growth in KSCs is considered appropriate to support services in these centres serving rural hinterlands.	No change to the V + O
Communities, 132	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23807	Support	Any new community facilities (GNLP 1060) should be offered within the remit of the Parish Council to ensure new facilities work in harmony with those in existence and remain viable and sustainable.	Support noted.	No change to the V + O
Communities, 132	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23865	Support	Would be good to expand on access to greenspace as a key part of what makes a community healthy and attractive.	Support noted. The Communities section of the V + O focusses on green spaces in developments assisting healthy and active lifestyles. Green Infrastructure is covered in more detail in para. 149 in the V + O.	No change to the V + O
Communities, 132	Ms Sue Catchpole [19509]	23951	Object	The GNLP has not complied with the Duty to Cooperate or consulted in line with its own standards.  The decision to pursue two large housing development sites instead of only one in Aylsham is not sound.	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 Duty to Cooperate on strategic matters has been also met, primarily through the Norfolk Strategic Planning Framework (NSPF).	No change to the V + O

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					A number of reasonable alternative sites previously consulted on, including a second site in Aylsham, have been included in the Reg. 19 plan. This is a sound approach to plan-making which follows consultation regulations.	
Homes, 133	Mr Trevor Bennett [14599]	23353	Object	Recent developments in Aylsham have : <ul style="list-style-type: none"> <li>failed to produce high quality homes.</li> <li>significantly increased pressure on infrastructure.</li> <li>not provided the social housing needed.</li> </ul>	The V + O aim to provide high quality new homes with a variety of types, tenures and sizes in mixed and inclusive communities is valid. Policies in the plan provide for high quality development, social housing and additional infrastructure required to serve growth.	No change to the V + O
Homes, 133	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23414	Object	Where is the proof that high quality homes are being built? Recent new homes in Acle were built to a low standard and have flooded twice in heavy rain.	Noted. The V + O aims to provide high quality new homes and minimise flood risk are valid.	No change to the V + O
Homes, 134	Mr Trevor Bennett [14599]	23440	Object	Question the accuracy and therefore soundness of the comment "our plan envisages the right number of homes". The number of homes is not sound due to the lack of consultation, the questionable understanding of population predictions, the awareness of economic developments and the need to increase the supply of homes to meet the demands of large-scale developers to maximise their profits. There is confusion in regard to the term need and demand.	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.	No change to the V + O
Homes, 135	Glavenhill Ltd [19356] Lanpro Services Ltd (Mrs Beccy Rejzek) [16106]	23814	Support	Support the vision in this paragraph but do not consider that the policies in the plan will deliver this vision in the most effective way. More of the growth should be focussed in the Strategic Growth Area (SGA) / Cambridge Norwich corridor, including at Stanfield Garden Village.	Support coupled with strategic growth location concerns noted. This strategy focusses a high proportion of growth in the SGA, taking account of the high existing levels of commitment. New settlements are planned for the next iteration of the plan	No change to the V + O
Homes, 135	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24210	Object	A large proportion of Breckland District Council's growth plans are concentrated in the same area of the Norwich – Cambridge Corridor The Council's main concerns are the cumulative impact of the growth on infrastructure particularly power and water. The Duty to Cooperate has not been met.	Breckland and Greater Norwich LPAs have supported coordinated growth in the Cambridge Norwich Tech Corridor through various initiatives.  The issues of power and water supplies have been considered and are being addressed on an ongoing basis with the utilities providers (UK Power Networks and Anglian Water (AW)). This is being done through cooperative work which both Breckland and Greater Norwich are engaged in, including through the NSPF and the Cambridge	No change to the V + O

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					<p>Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of the utilities companies. AW is planning for water transfers from Greater Norwich to Breckland.</p> <p>The councils will work together, as per the emerging Statement of Common Ground, with the utilities providers to ensure that water and power needs are met.</p>	
Homes, 136	Mr Trevor Bennett [14599]	23359	Object	Due to a lack of consultation and the information in point 136 is unsound as it is not accurate. By putting forward too many homes it will lead to poor services, notably significant pressure on medical care, education, the traffic network and parking. If previous developments are an indication they will not enhance local character.	See responses on consultation and infrastructure provision above. The aim that the policies in the plan should promote development which respects and enhances local character as set out in the V + O is valid.	No change to the V + O
Homes, 136	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23415	Object	The proposed density for new housing in Acle is not appropriate. The gardens are too small, resulting in people getting into their cars to travel to green space for recreation. The roads are too narrow, especially when people park on the pavements, because of inadequate parking. Parking also needs to be provided for visitors and tradespeople.	The aim that the policies in the plan should promote development which is built at appropriate densities and respects and enhances local character as set out in the V + O is valid.	No change to the V + O
Homes, 136	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23433	Object	<p>Para. 136 that: 'homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.' CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters.</p> <p>Also concerns over the "minimum" 1,200 figure in the South Norfolk clusters as this has not been consulted on and figures could be much higher.</p>	<p>The aim that the policies in the local plan should promote development which is built at appropriate densities to respect and enhance local character as set out in the V + O is valid. Unless a different V + O is tested and set through the subsidiary plan, this will also apply to the SNVCHA.</p> <p>Housing figures consulted on at the Reg.18C stage for the SNVCHA are slightly above the 1,200 figure.</p>	No change to the V + O
Homes, 136	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23731	Object	Para. 136 states that "homes will have good access to services and facilities" and they "will enhance local character to meet the needs of all mixed communities". The failure to meet the infrastructure needs of Aylsham, while wanting to expand the number of new homes by 83% from Reg 18, means that Reg 19 is not justified in respect of the document's own strategy.	See responses on infrastructure provision above. 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. The aim that the policies in the plan should promote development which respects and enhances local character as set out in the V + O is valid.	No change to the V + O
Homes, 136	La Ronde Wright (Alastair Curran, Principal Planning	24479	Object	The NPPF states " <i>planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.</i> " The GNLP does not propose a policy that supports this, instead proposing an allocation only approach, and exceptionally limited	It is considered that the GNLP provides for appropriate growth in and adjacent to villages to support local services and this is reflected in the V + O.	No change to the V + O

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Consultant) [20009]			windfall proposals through policy 7.5 the GNLP. Given the GNLP does not identify allocations for growth or provide a significant policy to support needed village and rural community growth, it is not compliant with national policies and is unsound in accordance with paragraph 35 of the NPPF.		
Homes, 136	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24487	Object	The NPPF states " <i>planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.</i> " The GNLP does not propose a policy that supports this, instead proposing an allocation only approach, and exceptionally limited windfall proposals through policy 7.5 the GNLP. Given the GNLP does not identify allocations for growth or provide a significant policy to support needed village and rural community growth, it is not compliant with national policies and is unsound in accordance with paragraph 35 of the NPPF.	It is considered that the GNLP provides for appropriate growth in and adjacent to villages to support local services and this is reflected in the V + O.	No change to the V + O
Homes, 137	Mr Trevor Bennett [14599]	23362	Object	From the outline plans it can be seen that the developers are working towards too high a density in the sites to enable sufficient green space. In addition the homes do not appear to be relevant to the changing nature of homes in regard to environmental pressures and the growth of working from home. In Aylsham the unsound decision to allocate two sites will further put too much pressure on the community.	Para. 137 of the V + O reflects the plan's inclusion in policy 5 of minimum size and adaptability standards for new homes.	No change to the V + O
Infrastructure, 138	Mr Trevor Bennett [14599]	23368	Object	The western link will create significant damage to the environment with destruction of valuable habitats in the Wensum Valley and damage to precious chalk streams. This policy is in conflict with the green agenda that is expressed later in the strategy and therefore is unsound.	The Norwich Western Link (NWL) is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change to the V + O
Infrastructure, 138	Mr Jeremy Barlett [19588]	23621	Object	The Western Link road will cause significant environmental damage to the Wensum Valley its wildlife. New roads generate more traffic - support for this road	The Norwich Western Link (NWL) is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a	No change to the V + O

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				directly contradicts 141 below "there will be a radical shift away from the use of the private car" and 140 "emissions from transport ... will be significantly reduced".	preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	
Infrastructure, 138	David Pett [19977]	24140	Object	<p>This response is submitted on behalf of the Stop the Wensum Link campaign (SWL). SWL comprises ecologists, scientists, lawyers, academics and environmentalists. SWL is supported by concerned individuals, who consider there is no need for the proposed Norwich Western Link (NWL) infrastructure project, and who argue it should be suspended.</p> <p>2. SWL strongly objects to the inclusion of the NWL within the GNLP (Plan). Interestingly, the Plan purports to exclude the NWL when it is manifestly obvious the intention is to include it (see below). SWL finds this pretence to be wholly objectionable.</p>	The Norwich Western Link (NWL) is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change to the V + O
Infrastructure, 141	Mr Trevor Bennett [14599]	23372	Object	This policy is unsound as it is in conflict with the demand for so many new homes. By increasing the number of new homes in the main towns, by a higher percentage in Reg.19 than in Reg 18, than Norwich it will mean more people using cars to come into the city. By putting forward 550 new homes for Aylsham with poor cycle links and an inadequate bus service, as well as no train there will a significant increase in road traffic into Norwich.	It is valid to flag up the intention in the V + O that development will be designed, and there will wider policies to promote, active travel and public transport use.	No change to the V + O
Infrastructure, 141	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23417	Object	Where is the evidence for this major shift away from private cars? Norfolk is a large, mostly rural county, with many villages with no public transport. These residents will still be driving to work. Public transport links only work in and out of town/city centres. Public transport is slow from, say Acle, into Norwich and the out to a business park. Much easier to drive!	It is valid to flag up the intention in the V + O that development will be designed, and there will wider policies to promote, active travel and public transport use.	No change to the V + O

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Infrastructure, 141	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23437	Object	The inclusion of this proposed road is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: 'for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' Policy 4 – Strategic Infrastructure suggests that 'a virtuous circle where clean transport is prioritised, less use is made of cars' will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in 'the end of the road? Challenging the road-building consensus' (CPRE, 2017.)	The Norwich Western Link (NWL) is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change to the V + O.
Infrastructure, 141	Sport England (Mr Philip Raiswell, Planning Manager) [13516]	23479	Support	Sport England supports the development of improved facilities for walkers and cyclists, as it encourages people to be more active in their daily life. This is one of the key principles of Sport England's Active Design guidance.	Support noted.	No change to the V + O.
Infrastructure, 141	Mr Jeremy Barlett [19588]	23624	Support	This all sounds good - but I have seen little or no evidence so far of "safe, attractive and well-designed routes for pedestrians and cyclists". Indeed, developments in the Norwich area have often reduced safe routes for cyclists and pedestrians. Needs to be backed up with action.	Support noted.	No change to the V + O.
Infrastructure, 141	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24211	Object	How far has this vision been scoped out with neighbouring local authorities?	Neighbouring local authorities have been involved in the production of the NSPF and other strategic planning initiatives which have informed the content of the vision and have had the opportunity to comment on it through consultations.	No change to the V + O
Infrastructure, 142	Ms Catherine Maclennan [19876]	23462	Object	See the same representation from the same person on para. 132 of the V+O	See the response to the same representation made on para. 132 of the V+O	No change to the V + O
Infrastructure, 142	Ms Sue Catchpole [19509]	23952	Object	See the same representation from the same person on para. 143 of the V+O	See the response to the same representation made on para. 143 of the V+O	No change to the V + O
Infrastructure, 143	Mr Trevor Bennett [14599]	23382	Object	This strategy is unsound as it will not happen given the past policies. Health services have declined in Aylsham during the last 40 years, despite an increase in population of 70% through large developments. At present the plans appear to be for replacing a primary school once the homes are built when all the schools are full now.	Health care providers have been involved with plan making and have provided information on infrastructure required to support growth. In consultation with the education authority, the site allocation policy for the Burgh Road allocation includes a requirement for a primary school. Its delivery will be dealt with through any planning application on the site.	No change to the V + O

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Infrastructure, 143	Ms Catherine Maclennan [19876]	23463	Object	See the same representation from the same person on para. 132 of the V+O	See the response to the same representation made on para. 132 of the V+O	No change to the V + O
Infrastructure, 143	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23729	Object	There is a lack of clarity and urgency in Reg 19 on the building of a primary school. A sound approach would be to state that, with all the primary schools in Aylsham full, the building of the school should take place as a priority.	In consultation with the education authority, the site allocation policy for the Burgh Road includes a requirement for a primary school. Its delivery will be dealt with through any planning application on the site.	No change to the V + O
Infrastructure, 143	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23732	Object	Lack of understanding of the problems by the principle authorities and a tendency to pay lip service to consulting and continuing with their pre-agreed plans. Particular concerns relate to: 1. Recent transport work in the town 2. Reg 19 failing to justify how two sites with 550 homes would not have an adverse impact on the health and social care of the town.	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. Health care providers have been involved with plan making and have provided information on infrastructure required to serve growth.	No change to the V + O
Infrastructure, 143	Ms Sue Catchpole [19509]	23953	Object	The GNLP has not complied with the Duty to Cooperate or consulted in line with its own standards.  The decision to pursue two large housing development sites instead of only one in Aylsham is not sound.	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 Duty to Cooperate on strategic matters has been also met, primarily through the Norfolk Strategic Planning Framework (NSPF).  A number of reasonable alternative sites previously consulted on, including a second site in Aylsham, have been included in the Reg. 19 plan. This is a sound approach to plan-making as the system for plan-making would be highly inflexible if sites could not be added between the Reg.18 and 19 stages.	No change to the V + O
Delivery, 144	Mr Peter Riseborough [18981]	23399	Object	Windfall developments are concealing the true nature of developments in villages in South Norfolk. Some village have no facilities, necessitating car journeys to access these.	The strategy includes an element of anticipated windfall delivery in its overall figures.	No change to the V + O
Environment, 145	Mr Patrick Prekopp [19860]	23544	Object	Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to ensure new development is adapted to a changed climate'. To achieve this in Aylsham, extra housing would have to meet carbon neutral standards to ensure greater efficiency in water and energy usage. As there is no evidence to justify this statement, the Plan fails on legal compliance and soundness in approach.	The V + O and the policies of the plan support greater water and energy efficiency.	No change to the V + O
Environment, 145	Environment Agency (Eastern Region) (Ms Jo	23781	Support	This section has not included anything here about rivers and water quality, such as: 'development will ensure that it is carried out in such locations and ways so that rivers	Support and proposed additional wording noted.	Make a minor modification to the wording at the end of

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	Firth, Team Leader) [13069]			and other water protected sites are protected from pollution and ensure water quality does not deteriorate'.	No changes are required for soundness, however the GNLP authorities accept that minor modifications should be made for clarity.	paragraph 145 so that it reads "Development will be carried out in such locations and ways so that rivers and other protected water sites are protected from pollution to ensure water quality does not deteriorate'.
Environment, 146	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23418	Object	Where is the evidence for this claim. Queuing traffic causes pollution on all the access roads into Norwich. Residents who live in rural areas and smaller villages have no choice but to drive into larger towns and the city.	It is entirely appropriate that the objectives of the GNLP should support air pollution levels being reduced through a combination of better design and location of development, supported by technological changes, more active travel and public transport use tied in with reduced use of private vehicles.	No change to the V + O
Environment, 146	Mr Trevor Bennett [14599]	23449	Object	This strategy, like so many of the ideas put forward is in conflict with the plan for over 49,000 new homes, many of them in areas that mean the only method of transport available to reach the places of employment is by car. Because of the significant increase planned for new homes it is probable that air quality, particularly near Norwich will decline as more people will be driving into the city for work, therefore the policy is unsound as it conflicts with the policy of 49,000 new homes.	It is entirely appropriate that the objectives of the GNLP should support air pollution levels being reduced through a combination of better design and location of development, supported by technological changes, more active travel and public transport use tied in with reduced use of private vehicles.	No change to the V + O
Environment, 146	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23867	Support	The role of greenspace, trees and habitat creation, including in urban areas, should be recognised as a key opportunity for improving air quality.	Support noted. GI is promoted in the V + O.	No change to the V + O
Environment, 147	Mr Trevor Bennett [14599]	23450	Object	As with nearly every strategy this conflicts with the strategy of the building of 49000 new homes. In respect of Aylsham to increase the number of new homes by 83% from Reg.18 to Reg.19 it will be impossible "to protect and enhance the distinctive characteristics of our towns". Given the experience of the last few years of developments the new homes will not be well designed and beautiful. This strategy is unsound as it does not support earlier strategies determining the amount of house building	It is valid for the V + O and in turn the policies of the GNLP to seek to protect and enhance the distinctive local characteristics of our towns.	No change to the V + O
Environment, 147	Historic England (Mrs Debbie Mack, Historic Environment	23958	Object	We welcome the reference to the protection and enhancement of distinctive local characteristics of our city, towns and villages and their separate identities. We also welcome the reference to high quality, well designed	No changes are required for soundness, however the GNLP authorities accept that some minor modifications should be made for clarity to para.147	Make a minor modification so that the sentence reads:

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]			and beautiful new development picking up on the Building Better Building Beautiful report.  However, this paragraph should also refer to landscape.	to include references to landscape characteristics and a further reference to green infrastructure.	This GNLP will protect and enhance the distinctive local characteristics of our city, towns and villages and their separate identities. <b><i>The distinctive characteristics of our landscapes will also be protected and enhanced.</i></b> This will be achieved by shaping high quality, well designed and beautiful new development <b><i>with green infrastructure in appropriate locations,</i></b> with homes large enough to provide for a good quality of life.
Environment, 148	Mr Jeremy Barlett [19588]	23630	Object	Although brownfield sites often are a better place to build than greenfield sites, this is not always true. Brownfield sites can sometimes support much higher levels of biodiversity than greenfield sites, and in these instances they must be protected.	It is valid that the V + O of the plan should have a general presumption that redevelopment of brownfield land should be a priority with the inclusion of Green Infrastructure and biodiversity net gain on such sites also an objective.	No change to the V + O
Environment, 148	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23869	Support	Supportive however the value of brownfield sites as open areas within urban settings should not be ignored. The potential of brownfield sites as important wildlife habitat should be recognised during development with adequate and appropriate mitigation and biodiversity net gain being put in place for any habitat loss	It is valid that the V + O of the plan should have a general presumption that redevelopment of brownfield land should be a priority with the inclusion of Green Infrastructure and biodiversity net gain on such sites also an objective.	No change to the V + O
Environment, 148	Sirius Planning (Miss Francesca Wray, Project Planner) [15640]	24548	Object	Development should make efficient use of brownfield sites within both urban and rural areas.	The V + O does not distinguish between urban and rural brownfield land.	No change to the V + O
Environment, 149	Sport England (Mr Philip Raiswell, Planning Manager) [13516]	23481	Support	Sport England supports the development of multi-functional green infrastructure, which will improve opportunities for active travel and leisure, in line with our Active Design guidance.	Support noted.	No change to the V + O
Environment, 149	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23647	Object	The paragraph states the quality of our environmental assets will be enhanced, but doesn't describe how or by whom. This quality will be maintained and enhanced by the landowners not the GNLP.	The V + O does not set out detail on implementation. This is dealt with in greater detail in the plan and through implementation plans. It is	No change to the V + O

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					accepted the role of landowners in improving GI will be critical.	
Environment, 149	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23873	Support	Would be good to see reference to other key GI opportunities such as Wensum Parkway - a major GI opportunity within the city centre. The Broadland Way and the Green Loop should also be included. The Green Loop offers potential to provide car free access to the County Park at Horsford via Marriott's Way.	Note support and request to include reference to other major planned GI projects.  Policy 3 is not location specific over GI as other opportunities may be identified either through local green infrastructure strategies or through other means, Consequently, it is best not to directly refer to specific GI projects beyond that already committed to at Horsford in the V+O.	No change to the V + O
Environment, 150	Mr Trevor Bennett [14599]	23451	Object	This strategy is unsound and not legally compliant as there is no evidence to support the statement, when the reality is the Plan is likely to increase greenhouse emissions.	The statement is considered valid. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.	No change to the V + O
The Plan's Objectives, 151	Noble Foods Ltd [19330] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23520	Object	No specific modifications are required to the Vision and Objectives. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that Site Allocation GNLP2143: Land south of Le Neve Road in Marsham is deleted to be consistent with objectives to protect the natural and historic environments.	No change to V + O requested.	No change to the V + O  No deletion elsewhere in the plan of the allocated site in Marsham.
The Plan's Objectives, 151	Taylor Wimpey [19920] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23619	Support	The topics and aspirations contained in the Vision and Objectives are supported. Land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172) should be retained as a for approximately 205 dwellings.	Support noted	No change to the V + O
The Plan's Objectives, 151	Sirius Planning (Miss Francesca Wray, Project Planner) [15640]	24549	Object	FCC consider that the objective for economy should reference the importance of the rural economy and the support for the vitality of rural communities.	The objective refers to supporting a broad-based economy which includes rural employment.	No change to the V + O

#### Section 4 – The delivery of growth and addressing climate change statements

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Delivery, 153	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24212	Object	What joined up measures were considered with those district councils on its borders where the intended growth is to occur?	Joined up measures have been considered in detail taking account of the NSPF. This includes implementing the series of agreements on strategic matters such as water efficiency and sustainable power supplies and the economic focus on low carbon growth. The GNLP team is working with Breckland to agree a Statement of Common Ground clarifying these points.	No change to the delivery statement.
Delivery, 155	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24213	Object	Where will this additional 22% be allocated within the local plan?	The buffer referred to is to ensure that the full housing need is met. It forms part of the overall site allocations and commitments and is not identified as separate in any way, so it is not possible to state which sites make up the buffer.	No change to the delivery statement.
Delivery, Delivery Statement	Mr Hugh Ivins [14963]	23335	Object	The document is not sound and the duty to co-operate is non-existent because it fails to take account of local representations regarding the Reepham REP1 proposed allocation which resulted in the largest number of local objections when considered as part of the Broadland Local Plan Site Allocations DPD of 2016. Additionally REP2 has been superseded by the implementation of Planning Consent 20180963 which has no Market/Affordable Housing element, resulting in a shortfall of housing	The Duty to Cooperate relates to strategic cross boundary matters such as infrastructure and meeting overall housing requirements. Policy 7.3 of the and the Sites Plan in the GNLP carry forward adopted housing sites in Reepham. The policies of the plan overall set requirements against which planning applications are assessed on a case by case basis.	No change to the delivery statement.
Delivery, Delivery Statement	Mr Trevor Bennett [14599]	23452	Object	I support the comments of Hugh Ivins, but wish to add that the document is not legally compliant due to the lack of consultation on changes to the number of homes from Reg.18 to Reg.19. In addition I believe that to consider work with the private sector to overcome constraints to planning is an insult to all who live and work in the community, including all town and parish councils. To consider that developers should be worked with and not local organisations makes the strategy unsound and unethical.	The three Regulation 18 consultations, including a draft plan with reasonable alternatives for housing sites and numbers, followed by the Regulation 19 publication stage, constitute effective consultation. It is unclear why councils should not work with developers which provide the great majority of the homes many people in the area desperately need.	No change to the delivery statement.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Delivery, Delivery Statement	Mrs Janet Skidmore [19326] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23498	Object	No specific modifications are required to the Delivery Statement. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that an additional allocation or contingency site is identified at Wymondham at land south of Gonville Hall Farm (Site Ref. GNLP0320).	No change to the delivery statement requested.	No change to the delivery statement.  No change elsewhere in the plan to the housing numbers or sites in Wymondham (see policies 1 and 7.2)
Delivery, Delivery Statement	Noble Foods Ltd [19330] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23521	Object	No specific modifications are required to the Delivery Statement or Vision and Objectives. However, it is requested that modifications are made to the housing requirement in Policy 1 to ensure consistency with national guidance, and that land at Fengate Farm in Marsham (Site Ref. GNLP3035) is specifically allocated in Draft GNLP or is incorporated into the village boundary to enable the delivery of affordable housing.	No change to the delivery statement requested.	No change to the delivery statement.  No change to policies to allocate Marsham site.
Delivery, Delivery Statement	Taylor Wimpey [19920] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23620	Support	The proactive approach to the delivery of housing, the allocation of sites which are deliverable, and to work with developers to deliver housing sites in the Delivery Statement is supported. The proposed allocation at Site Ref. Policy GNLP0172 in Rackheath is consistent with the aims of the Delivery Statement.	Support noted	No change to the delivery statement.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Delivery, Delivery Statement	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	23662	Object	Agree with the GNLP promoting a pro-active approach to delivery of housing, by only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be clearly evidenced. However, do not support the disproportionate allocation approach and believe there should be more land allocated in Wymondham.	No change to the Delivery Statement requested.	No change to the delivery statement or elsewhere in the plan to allocate more land in Wymondham (policies 1 and 7.2)
Delivery, Delivery Statement	Mr Adam Wolton [19530]	23842	Object	The GNLP does not meet the NPPF requirement for sustainable development. The GNLP is not compliant with the legal requirement to mitigate and adapt to climate change in Section 19 (1A) of the Planning and Compulsory Purchase Act 2004. A policy of concentrating development within the Norwich urban area should be pursued to enable the plan to be sustainable.	The strategy maximises the potential for development in the Norwich Urban Area, including identifying strategic growth areas in East Norwich and the North City Centre and sustainable urban extensions.	No change to the delivery statement.
V + O Delivery,	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]	23932	Object	Reference should be made to Norfolk Constabulary infrastructure.  Para 143 should add reference to the police and read as follows:  Existing schools, police and health facilities will be expanded, and new facilities provided to serve growing communities, with greater use of technology to access some types of health care.	Whilst not needed for soundness purposes, it is accepted that, subject to evidence of what infrastructure is needed being provided, minor modifications could be made.	Subject to evidence of what infrastructure is needed being available, minor modifications could be made to add reference to Norfolk Constabulary as follows: The Greater Norwich partners will continue to work to coordinate delivery with other providers including Highways England, Anglian Water, other transport and utilities companies, town and parish council, <b>Norfolk Constabulary</b> and local health care providers.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
						Infrastructure will be delivered through: .....
Delivery, Delivery Statement	Sirius Planning (Miss Francesca Wray, Project Planner) [15640]	24302	Object	FCC supports the inclusion of the following statement that “ <i>smaller scale and rural employment sites are less likely to be constrained by infrastructure requirements and will be supported in accessible and sustainable locations</i> ”. However, it is considered that the plan doesn’t go far enough in supporting the rural economy with no reference to employment development within the countryside where a rural location outside settlement boundaries can be justified. This is explored further within comments on Policies 1, 6 and 7.4 below.	The Delivery Statement reflects the plan’s general approach of focussing employment growth in and around existing settlements rather than in the open countryside, whilst allowing for some flexibility.	No change to the Delivery Statement
The delivery of growth and addressing climate change, 152 and 153	Mr Andrew Cawdron [12806]	24418	Object	<p>The plan implies acceptance of historic solutions throughout and fails to address the consequences of those solutions of which we are increasingly aware in relation to</p> <ul style="list-style-type: none"> <li>resources use</li> <li>population growth, inward migration and continued development,</li> <li>biodiversity and ecosystems</li> <li>carbon emissions.</li> </ul> <p>Paying lip-service to targets without active solutions is unsustainable</p> <p>Diminishing the supply of agricultural land in a currently friendly climate area is an illogical activity.</p> <p>GNDP should examine the Waste profile of our activities and include for diminishing consumerism, reducing waste from plastics, clothing, household goods and activities like building/refurbishment and place zero carbon targets on development.</p> <p>It is now time critical and should be formalised.</p> <p>The whole ethos of the ‘fringe’ areas, towns and service villages is unsustainable in terms of human connectivity to work and services, as so much is no the ‘beyond a good walk’ limit (the NE Growth Triangle being a prime example). At three miles out from Norwich City Centre on green field sites of quality agricultural land, creating abandoned’ dormitory suburbs without centres or</p>	<p>The plan seeks to meet growth needs through a sustainable growth strategy which focusses development on brownfield sites as much as possible and allocates greenfield sites on the edge of existing settlements enabling access to existing or new services.</p> <p>Waste issues are covered by Norfolk County Council.</p> <p>Whilst not required for soundness, it is accepted that a reference to development being designed to ensure services can be accessed locally would provide greater clarity.</p>	<p>Minor modifications are proposed to the <i>design of development</i> section of the <i>climate change statement</i> and elsewhere in the plan to focus further on the plan’s policies which ensure services will be provided locally.</p> <p>This includes adding the bold sentence below so that the paragraph reads:</p> <p>To achieve this, development must be designed to promote local service provision, include green infrastructure and reduce the need to travel. It must promote the use of public transport and active travel, along with supporting electric vehicle use. <b>The aim is to establish 20- minute neighbourhoods in which most of people’s daily needs can be met locally.</b></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>services and all accessible only by personal transport, thereby adding to the traffic volumes.</p> <p>Let us take the alternative approach, which is NOT to develop unless it can be proved that the three tenets of the NPPF (and the future of the planet) are demonstrated beyond doubt. Economic, Social and Environmental benefit must be given equal importance, with a controlling bias towards the Environment.</p>		
Addressing Climate Change, 156	Ann Nix [19995]	24272	Object	<p>Local plans must set strategic policies which address climate change mitigation and adaptation.</p> <p>What:</p> <ul style="list-style-type: none"> <li>• Provisions will be made for infrastructure for electric cars?</li> <li>• Will be done to improve rural public transport?</li> <li>• Evidence is there in the plan that it will contribute to emissions reductions?</li> <li>• Will be done to promote biodiversity gain?</li> </ul> <p>Too much growth is planned for given population projections.</p> <p>The best way to sustain rural communities is to ensure that they are well connected to local service centres, retail and cultural facilities, and employment opportunities.</p>	The climate change statement sets out the broad ranged approach to plan takes to addressing climate change. This includes promoting electric car use (policy 2) and biodiversity net gain (policy 3), as well as the overall strategy which aims to make best use of existing services and reduce the need to travel.	No change to the climate change statement.
Addressing Climate Change, 157	Mr Andrew Driver [17078]	23726	Object	<p>The GNLP is an opportunity to ensure that all new developments are totally environmentally sustainable. Currently the plan does not adequately meet the requirements for carbon neutrality. As a minimum the plan should require all developers to ensure that all houses built should be insulated to the highest possible standards, to all include solar panels for electricity generation and hot water heating, environmentally sustainable heating and grey water capture. The current wording of the plan does not make this clear enough and this is a major missed opportunity to be ambitious, innovative and trail blazing.</p>	<p>The plan sets the highest water efficiency standards permitted by government.</p> <p>It also promotes local, sustainable generation of energy. Government has indicated its intention to introduce revised Building Regulations to require greater energy efficiency in new homes. The GNLP currently includes measures to promote energy efficiency in policy 2 which seem likely to be superseded by the revised national standards.</p>	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23413	Object	<p>The plans are flawed. By placing such emphasis on the public transport available in larger villages and towns, you ignore the fact that the bus takes you into central Norwich, but it is then very difficult to get to any out of town employment centres, so everyone drives their car instead. The plans talk about reducing car parking on housing estates but then everyone has two cars and parks them across the pavements</p>	The plan, as required in national planning policy, promotes sustainable travel and a range of types of homes to meet the differing needs of our population.	No changes to the Climate Change Statement.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				Also, by requiring a high density for new housing, private gardens are too small, resulting in families driving around Norfolk to get some fresh air.		
Addressing Climate Change, Climate Change Statement	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23424	Object	<p>The GNLP's Climate Change Statement states that it will have an effective monitoring regime on reducing carbon dioxide emissions, but the plan does not include clear evidence-based carbon reduction targets. These are needed for the GNLP to demonstrate how it will meet its legal obligations. Policies should have carbon reduction at their core for the location of development, transport planning, environmental policies to promote carbon neutral development, and others where sustainability is a key.</p> <p>Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre.</p> <p>This includes the strategy for growth which has too much dispersal of development, contradicting SA findings.</p> <p>Excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet carbon reduction requirements.</p> <p>To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations.</p>	<p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:</p> <ol style="list-style-type: none"> <li>1. National targets regularly change so it is appropriate that GN should <b>contribute to</b> those national targets and those targets are updated when they change prior to adoption;</li> <li>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be <b>contributed to</b> by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</li> </ol> <p>Responses to other reps. made by the CPRE set out how the strategy promotes suitable amounts of housing to meet needs in a broad range of locations, with the great majority of the homes in and around the Norwich urban area, the towns and the larger villages.</p>	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Hanne Lene Schierff [19871]	23454	Object	Inclusion of the proposed Norwich Western Link Road is incompatible with the climate change statement and its inclusion is therefore unsound.	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3	No changes to the Climate Change Statement.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					(Environmental Protection and Enhancement), together with all other material considerations.	
Addressing Climate Change, Climate Change Statement	Mrs Janet Skidmore [19326] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23499	Support	The Climate Change Statement identifies a range of measures that development could deliver to address climate change, including measures related to the location of development, design, energy use and biodiversity net gain. The promoted site south of Gonville Hall Farm would deliver measures to address climate change, if the site selected as an allocation or contingency site.	Support noted.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Noble Foods Ltd [19330] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23522	Support	The Climate Change Statement identifies a range of measures that development could deliver to address climate change, including measures related to the location of development, design, energy use and biodiversity net gain. The promoted development on land at Fengate Farm in Marsham would deliver measures to address climate change if the site were selected as an alternative allocation.	Support noted.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Taylor Wimpey [19920] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23622	Support	The Climate Change Statement at Paragraph 157 identifies a range of measures that development could deliver to address climate change, including measures related to the location of development, design, energy use and biodiversity net gain. The proposed allocation at land to the west of Green Lane West in Rackheath (Ref. Policy GNL0172), as promoted by Taylor Wimpey, would be consistent with the identified climate change measures.	Support noted.	No changes to the Climate Change Statement.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Addressing Climate Change, Climate Change Statement	Mr Jeremy Barlett [19588]	23631	Object	Support for Norwich Western Link should be dropped as it is incompatible with other parts of the plan. As well as damaging the Wensum Valley it will lead to increased usage of the private car and a consequent increase in carbon emissions.	<p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p> <p>Representation also noted in relation to policy 4 on infrastructure.</p>	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23733	Object	An important strategy of the document and Central Government Policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by putting forward two sites for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target. One site, as was consulted upon in Reg 18, was a problem regarding working towards a climate neutral target, but to increase the number of new homes dependent on cars by 83% without consultation is negligent in respect of keeping to Central Government Policy and the Paris Accord.	<p>Both sites proposed for allocation are considered to be well located in relation to public transport, employment, services and other facilities within Aylsham. The town itself has a good range of facilities.</p> <p>Regulation 18C consultation was undertaken on overall housing numbers and included alternative sites such as the one identified should there be a need to amend overall housing numbers in the plan.</p>	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Mr Richard Taylor [19828]	23746	Object	<p>The stated aim of 'working towards' carbon neutral is too vague.</p> <p>Central to sustainability and carbon reduction are decisions about location (of both residential and employment sites), transport policy and environmental policies, as well as specifics of good design and energy use. Large scale development in some KSCs will overwhelm and not support already stressed services and infrastructure (e.g. in Aylsham and Reepham)</p> <p>The strategy should:</p> <ul style="list-style-type: none"> <li>• Reduce the 22% buffer</li> <li>• Focus development sites near Central Norwich &amp; Norwich/Cambridge corridor + reduce dispersal to KSCs.</li> <li>• Include vehicle recharging infrastructure</li> </ul>	<p>The strategy focusses the great majority of growth in the urban area and our towns and larger villages, as these are the locations with the best access to services and facilities.</p> <p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth.</p>	No changes to the Climate Change Statement.

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>If the market for this additional housing does not materialise, they will not be provided.</p> <p>Policy 2 of the plan covers vehicle recharging infrastructure.</p>	
Addressing Climate Change, Climate Change Statement	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23785	Support	The climate change table is a good improvement to the plan and we fully support this.	Support noted.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23879	Object	The policy targets for energy efficiency and renewable energy are missing an opportunity already taken by other local authorities to make a greater contribution to national climate change targets and increase certainty that the 2050 targets will be met.	The plan promotes local, sustainable generation of energy. Government has indicated its intention to introduce revised Building Regulations to require greater energy efficiency in new homes. The GNLP currently includes measures to promote energy efficiency in policy 2 which seem likely to be superseded by the revised national standards.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23881	Object	<p>Climate change impacts such as overheating do not appear to be addressed by plan policy, leaving no mechanism for the plan to deliver robust positive outcomes for climate change adaptation.</p> <p>The plan needs to require new growth to deliver a suite of green infrastructure measures that deliver climate change adaptation across the range of expected impacts, including flooding, urban overheating and air quality. All new development in urban areas should provide green infrastructure that can help the urban environment adapt to the changing climate.</p>	Climate change mitigation and adaptation requirements for all development in policy 2 cover a number of measures, including reducing overheating. Green infrastructure provision is required by a number of the plan's policies as set out in the statement.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23959	Object	<p>There is currently no reference to the question of climate change and the historic environment.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction.</p>	Such detail is regarded as being better suited to detailed development management policies rather than a strategy.	No changes to the Climate Change Statement.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Addressing Climate Change, Climate Change Statement	Sirius Planning (Miss Francesca Wray, Project Planner) [15640]	24301	Object	The Climate Change Statement measures presented is requiring the location and design of development to ... reduce the need to travel, particularly by private car. The distribution of the great majority of growth thus reduces the need to travel. Although FCC supports this in principle, it is considered that the GNLP should be flexible and consider certain developments which require to be located in rural locations away from urban areas or development in rural locations where communities are dependent on the private car. Such proposals can incorporate sustainable initiatives and consider climate change impacts within their design.	The plan's policies, along with adopted development management policies, allow for employment development in rural areas under specific circumstances. In general, the focus is for employment to be located on the most accessible sites.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Mr Andrew Cawdron [12806]	24412	Object	<p>The GNLP should actively contribute to the mitigation of and adaptation to climate change. The GNLP should adopt policies which will reduce greenhouse gas emissions, e.g. by reducing vehicle dependency or setting dwelling carbon target standards above those of the current Building Regulations.</p> <p>The lack of a proactive series of proposals to reduce the level of carbon emissions is unsound given the gravity of the potential responses to Climate Change and the challenges to biodiversity and our surrounding ecology.</p> <p>The primary problem is the acceptance of the relentless level of growth, the second the acceptance of the level of private car use (which is also a major factor in air quality problems), the third is that resources continue to be stripped from exhaustible reserves and the fourth is that there is no end vision.</p> <p>When will the loss of growing land be seen as a grand failure to husband a precious natural resource?</p>	The plan maximises brownfield opportunities and supports development on green field sites in accessible locations on the edge of settlements. The statement sets out the proactive approach of the plan to addressing climate change.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	David Lock Associates (Heather Pugh, Partner) [20014]	24453	Object	Support the GNLP's ambition to address climate change and shift to a post-carbon economy. New settlements present the best opportunity to achieve these ambitions both within the current plan period and beyond as opposed to the range of sites of varying sizes that do not present a coherent approach to addressing the ambition of a net zero carbon emissions growth plan.	Policy 7.6 sets out the intention that the next plan will include a new settlement or settlements. At this stage, with a number of brownfield sites and sustainable urban extensions available, this is not regarded as the best option for growth.	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Broadland Green Party (Jan Davis, Coordinator) [19650]	24483	Object	The GNLP provides no effective modelling of baseline carbon emissions for the plan area and how to reduce them by 2038. The Planning and Compulsory Purchase Act 2004 requires, by law, robust climate change policies in local plans. Such climate change policies	Rather than providing a single overriding climate change policy, the plan recognises the NPPF's requirements on climate changing by setting out its broad ranging approach to addressing climate change throughout the plan in its Climate Change Statement. This is a suitable approach for a	No changes to the Climate Change Statement.

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>should be consistent with national policy. NPPF 149 states:  <i>“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”.</i>            Local Plans must also be in line with the objectives and provisions of the Climate Change Act 2008.            Without an overriding strategic policy on how climate change will be addressed within the GNLP the plan is neither effective nor sound.</p> <p>The inclusion of the NWL in the GNLP is unsound and not consistent with national policy to reduce transport emissions by 70% by 2035.</p>	<p>strategic local plan which also includes a number of site allocations.</p> <p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p>	
Addressing Climate Change, Climate Change Statement	Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	24529	Object	<p>The IPPC report, the Climate Change Act and the legal duties on local planning authorities around climate change mitigation and adaptation mean that climate change needs to take a more central role within Local Plans, and Local Plans need to take a more rigorous approach to bringing forward development which is consistent with and moves very quickly towards a zero carbon world, with radical changes set in motion well within the lifetime of your plan. The gradualist approach set out in the plan is not equal to the scale and rate of change required. The challenge to entirely de-carbonise our society also demands that all other policies be tested against this objective.</p>	<p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:</p> <ol style="list-style-type: none"> <li>1.National targets regularly change so it is appropriate that GN should contribute to those national targets;</li> <li>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</li> </ol>	No changes to the Climate Change Statement.
Addressing Climate Change, Climate Change Statement	Mr Bryan Robinson [14521]	24536	Object	<p>Any excess house building above need will slow the path to zero carbon which is not in line with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that:  <i>“development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”.</i></p>	<p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:</p> <ol style="list-style-type: none"> <li>1.National targets regularly change so it is appropriate that GN should contribute to those national targets;</li> <li>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely</li> </ol>	No changes to the Climate Change Statement.

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>Where is the evidence the statement at paragraph 131 that “<i>our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national zero emission target by 2050.</i>”</p> <p>Whilst the GNLP Climate Change Statement states that it will “<i>have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks</i>”, it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations.</p> <p>There is no mention of the December 2020 target announced by the Government for a carbon emissions reduction of at least 68% by 2030 compared to 1990 levels.</p> <p>Carbon emission details are available from 2005 but the plan should establish the 1990 levels for the GNLP area together to enable monitoring against this target.</p> <p>It is essential for the GNLP to establish the carbon emissions between 1990 and 2005 setting the baseline emissions position for the plan to adequately monitor reductions to 2030 ensuring the minimum 68% reduction is achieved.</p> <p>The data from 2005 would suggest that Broadland and South Norfolk will need to accelerate the speed of reduction to 2030 if they are to meet this Government target.</p> <p>There are no specific proposals in the GNLP outlining how the carbon emissions imbalance from transport will be resolved or evidenced that it will not be exaggerated by the location proposals for housing and employment in the plan coupled with any attendant additional transport infrastructure and increased commuting journeys.</p> <p>Although there are numbers quoted in the GNLP for both jobs and housing there is no indication of correlation between them to determine whether transport emissions from work commuting will further</p>	<p>beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</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>increase over the period of the plan or more importantly by 2030.</p> <p>It is probable that the site allocations will increase transport use rather than encourage a modal shift to other forms of transport as the ambition of the GNLP.</p> <p>Reliance on the switch to electric vehicles for transport emission reductions will assist over the longer term but this will still be marginal up to 2030 unless the GNLP has information to the contrary outside the Reg. 19 draft.</p> <p>The GNLP vision is endorsed but concern must be expressed that it is woefully lacking on specific measures and targets.</p>		

## Section 5 – The Strategy

### Policy 1 – The Sustainable Growth Strategy

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Introduction, 158	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23425	Object	The GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that <i>'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038'</i> , whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".	Though not required for soundness purposes, it is accepted that a minor modification to paragraph 158 for clarity should be made	Make a minor modification so that paragraph 158 reads <i>'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern, scale and nature of sustainable development to meet growth needs in Greater Norwich from 2018 to 2038'</i>
Introduction, 158	Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]	23855	Object	<p>a) GNLP needs to meet the NPPF definition of Sustainable Development;</p> <p>b) GNLP needs to follow NPPF guidance on conserving and enhancing the natural environment</p> <p>c) GNLP needs to follow NPPF guidance on sustainable transport</p> <p>d) Proposals for sustainable transport should be part of decision making from the earliest stages (NPPF para 102) and should be included in the plan and should form part of the assessment for development sites. Coltishall will suffer further traffic growth due the Norwich Western Link Road and dispersed housing development. As noted above there are no proposals for sustainable transport that might partly mitigate this harm</p> <p>e) The minimum figure of 42,568 (40,541+ 5% buffer) should therefore be the housing target, both to reduce the harm of the proposed development, and to reflect recent demographic changes.</p>	No specific changes to the text have been proposed through the representation. The highlighted issues of sustainable development, conserving and enhancing the natural environment, sustainable transport and housing numbers have all been key considerations for the plan and policy 1 overall, as well as for this introductory paragraph.	Minor modifications to para 158 proposed as set out above.
Introduction, 162	Mr Christopher Yardley [16025]	23707	Object	1. GNLP envisages significant growth in the population of around 16% between 2018 and 2038. The basis of the development plan has to be supported by 'sustainability principles'. Paragraph 162 of the Sustainable Growth Strategy seeks to promote Norwich as a key growth area to support the development of the national economy. It states that	<p>1. The plan needs to provide for economic, social and environmental sustainability in its growth plans.</p> <p>2. Anglian Water's Water Resources Management Plan, which has addressed the Habitats</p>	No change to the text.

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>both greenfield and brownfield sites will be developed. The aims of the policy are fundamentally in conflict and cannot be reconciled. It is not possible to achieve large scale growth and protect and enhance the environment.</p> <p>2. There are water shortage problems in Norfolk, and East Anglia. There is no indication in the GNLP as to how this situation will be addressed and habitats protected in line with Habitats Regulations.</p> <p>3. The fundamental tenant of sustainability is that it should not damage or harm the environment in a manner which will result in cumulative net adverse impacts. The choice of a largely un-developed rural county to be targeted for large scale development and growth in preference to other areas of the Country which are already developed / damaged, and in need of regeneration / already have unemployment figures which suggest an underemployed workforce is again contrary to sustainability principles.</p> <p>Other areas of the Country are much better connected, have better existing infrastructure and clearly will have significantly lower adverse environmental impacts from development than those proposed in the GNLP. No sequential test to compare or even consider these issues is contained in the Plan, and therefore it fails the test of sustainability on this account.</p> <p>4. Large scale development as proposed will require responses in the form of new infrastructure and services. These needs are referenced but not quantified and planned for within the GNLP and there are no indications where or specifically how they will be provided for although broad references to various sources of funding (none specific) are referred to. To propose large scale migration and development without ensuring that the means to support it are present and will be adequate / appropriately located is again risking an unsustainable community development and contrary to sustainability principles.</p>	<p>Regulations, provides for water resources for growth (see policies 2 and 4 of the GNLP)</p> <p>3. Greater Norwich's growth needs cannot be met elsewhere in the country. The GNLP aims to ensure that the growth it promotes is planned sustainably.</p> <p>Policies 2 and 4 provide for on-site and off-site infrastructure needs. This infrastructure will be provided by a range of organisations which generally fund such infrastructure e.g. Anglian Water for water infrastructure, Norfolk County Council for highways and education. Other funding is set out in separate infrastructure plans which will be updated over time to reflect any changed circumstances.</p>	
Introduction, 162	Mr John Hill [15088]	23710	Object	This plan is not very flexible because the time taken to get to final approval has and will take far too long "at a	Whilst it is accepted that plan-making is a long process, policies are deliberately flexible to adapt to	No change to the text.

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>time of rapid change". There is so much uncertainty at present regarding the economy and future social trends, so it could be that some of the proposed allocations may not be needed in the plan period. But once allocations have been made it will be difficult for the planning authorities to "row back" and resist unwanted development in the future.</p> <p>This part of the plan would say that the plan is flexible because whilst there is a long-term "vision", specific land allocations are being limited in scope at this stage, subject to review in a few years time (e.g. five years) when conditions will have changed. The exception to this rule would be genuinely sustainable large-scale proposals, such a new settlement, which require long-term commitment and certainty. (N.B. the above obviously implies that I think there should be changes to many of the policies and allocations in the GNLP and to the plan-making process itself.)</p>	changing circumstances. Reviews of plans are required to keep them up to date. Policy 7.6 of this plan signals the intention to bring forward a new settlement or settlements through a subsequent plan/s.	
Introduction, 163	Mr Jeremy Barlett [19588]	23633	Object	By including the Norwich Western Link, the plan ignores evidence that building this road will cause major damage to the Wensum valley and its wildlife. It is therefore not "based on an extensive evidence base".	An extensive evidence base has been produced to guide the plan. The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change to the text.
Introduction, 165	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23446	Object	The GNLP would be better future-proofed by more clearly recognising the need to tackle climate change throughout the life of the plan through a reduction in the total number of houses to the minimum required, along with more serious consideration on environmental grounds as to the best location for this housing. This would be a more sound and responsible approach than that currently suggested in the Reg. 19 GNLP, which is to go far beyond what is "needed", by allocating sites for anticipated additional housing which may not be necessary.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.	No change to the plan

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 summary a sound 'future proofed' sustainable way forward that best protects the environment (nature and the landscape) and mitigates the impact of Climate Change should involve:</p> <ul style="list-style-type: none"> <li>• Setting the total housing potential at the minimum level required through the application of the government's standard methodology plus a 5% buffer – i.e. 40,541 + 2,027 = 42,568</li> <li>• Planning for the provision of the additional 5,876 houses that would be required if the minimum level was applied i.e. 42,568 - 36,692 (31,452 current commitments plus 5,240 already built) through concentration of development in Norwich using Brownfield sites and by converting redundant city centre retail and office space into residential usage, thereby aiding city centre regeneration. Windfalls could also make a greater contribution than currently allowed for in the draft plan (the NPPF allows for evidence-based windfalls to be included)</li> <li>• Dropping policies 7.4 Village Clusters and 7.5 Small Scale Windfall Housing Development and plans to disperse development widely over large areas of countryside from the GNLP – none of these climate threatening options are needed if the minimum housing requirement is chosen, and removing them would secure the integrity of existing settlement development boundaries, whilst still allowing for some growth where there are existing JCS allocated sites.</li> <li>• Providing a Green Belt on the Green Wedges model to protect the countryside around Norwich from urban sprawl.</li> <li>• Prioritising the provision of affordable social housing – this can best be achieved in rural areas via the use of exemption sites allocated where local housing association surveys identify a need, and should be provided by those housing associations working together with parish and town councils</li> <li>• Accepting that the phasing of development is the best way to offer the opportunity for a further 5,000 houses in</li> </ul>	<p>The strategy seeks to maximise the use of brownfield sites. Although it is accepted that there is a possibility of windfall arising from likely economic changes which the strategy will enable to come forward, the amount of additional sites this will provide is unlikely to make a significant contribution to providing sites to address housing needs.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>Regulation 18 included consultation on the potential for a Green Belt. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. Establishing a Green Belt at this stage would reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.</p> <p>The scale of housing need in the area is so high that phasing is not a practical approach as it would reduce flexibility in relation to the delivery of housing.</p>	

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				<p>the GNLP; housing that would only be needed if the 2018-based ONS household projections (which indicate that growth may be higher than predicted by the standard methodology 2014-based projections) prove to be correct. The phasing of sites is the sensible and sound way forward – sites would be made available if needed but otherwise remain undeveloped. If historic build rates are a reliable indicator of future trends it seems highly unlikely that these extra sites will be required.</p> <ul style="list-style-type: none"> <li>• Prioritising sites for development as part of a phased delivery plan. The use of current allocations and urban Brownfield sites, together with the conversion of redundant office and retail space for residential purposes should take precedence over development on Greenfield sites. As part of this phased delivery Brownfield sites, identified in the list of sites to accommodate the extra 5,000 houses, such as sites for 2,000 houses in East Norwich, should be scheduled for development before sites in village clusters and elsewhere in the countryside. There is no sound reason why the composition of the sites allocated to accommodate the potential for an additional 5,000 houses cannot be altered with Greenfield sites (e.g. all the new village cluster sites) being moved in to the phased 5,000 list (to be developed only if needed) with their place in the plan taken by identified Brownfield sites.</li> </ul> <p>There is no need for all sites to be made available for development at the start of the plan. The 31,452 current allocations already provide plenty of flexibility and developer choice and there is little evidence to suggest that increasing the level of allocations leads to an increase in the delivery of new housing – it is far more likely to lead to an escalation in the number of land-banked sites and would encourage developers to “cherry pick” more attractive, cheaper to develop rural sites ahead of the more sustainable, climate-friendly urban Brownfield options.</p>		
Introduction, 165	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24215	Object	<p>Breckland District Council has concerns over the Greater Norwich Local Plan and its growth plans. A large proportion of Breckland District Council’s growth plans are concentrated in the same area of the Norwich – Cambridge Corridor and the Council’s main concerns are the cumulative impact of the growth on infrastructure particularly power which has been identified as a constraint in this area in the Greater Norwich Energy</p>	<p>Breckland and Greater Norwich LPAs have supported coordinated growth in the Cambridge Norwich Tech Corridor through various initiatives.</p> <p>The issues of power and water supplies have been considered and are being addressed on an ongoing basis with the utilities providers (UK Power Networks and Anglian Water (AW)).</p>	<p>No change to paragraph 165. Make a minor modification to remove the second sentence of footnote 53 as its reference to transitional arrangements is now out of date.</p>

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				<p>Study April 2019. However, this study has failed to consider the cumulative growth of both Breckland and GNLN growth plans. Sufficient water resources both supply and waste management is also a concern as indicated in the Anglian Water Resources Management Study 2019. The Council does not consider the water efficiency policies proposed are going to adequately address the water requirements to support the growth from both Breckland and the Greater Norwich area.</p> <p>Under the Duty to Cooperate, Breckland District Council would welcome the earliest opportunity to engage with GNLN to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas.</p> <p>The Council is also particularly interested in any growth aspirations along the A47 at Honingham Thorpe; and A11 at Hethel and Silfield which would further put pressure on infrastructure in the area and under the Duty to Cooperate, Breckland District Council would welcome the earliest opportunity to engage with GNLN to explore the location and impact of any proposals in the Honingham Thorpe, Hethel and Silfield area on infrastructure including power and water as well as the impact on Breckland's communities living nearby and to work jointly to minimise any adverse effects which may arise as a result.</p>	<p>This is being done through cooperative work which both Breckland and Greater Norwich are engaged in, including through the NSPF and the Cambridge Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of the utilities companies. AW is planning for water transfers from Greater Norwich to Breckland.</p> <p>New settlements are proposed through the GNLN for the next plan.</p> <p>The councils will work together, as per the emerging Statement of Common Ground, with the utilities providers to ensure that water and power needs are met and on co-operative work on new settlements.</p>	
Employment Growth Needs, 170	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24216	Object	Breckland also has substantial employment land allocated in this area and have concerns on the impact of cumulative growth on infrastructure (see above also)	The GNDP authorities will work with Breckland to implement the agreed NSPF employment guidance, enabling economic synergies to be promoted.	No change to the text.
Housing Growth Needs, 178	Mr Trevor Bennett [14599]	23560	Object	The statement points out that the buffer is greater than was needed, however there is not logical justification as to why this decision was taken. The impact on the area of this scale of building will create many problems. The lack of an analytical cost benefit analysis makes this policy unsound.	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>Cost benefit analysis is not applied to local plans which are required to be supported by a wide range of evidence including sustainability appraisal.</p>	No change to the text.

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Housing Growth Needs, Table 6 Establishing the Plan's total housing potential figure	Woods Hardwick Planning Ltd (Paul Woods) [19974]	24114	Object	<p>We consider that the Plan's approach to accommodating housing growth needs is unsound in respect of two areas:</p> <ol style="list-style-type: none"> <li>1. The inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need; and</li> <li>2. The distribution of new housing allocations across the defined settlement hierarchy comprising the Norwich urban area, main towns, key service centres and village clusters.</li> </ol> <p><b>The inclusion of policy 7.5 and windfall allowance sites</b></p> <p>We agree that a buffer should be applied to the identified minimum housing need figure based on the Government's standard methodology using 2014 based projections and that this should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal; for the reasons set out at paragraph 178 of the draft Plan related to the Government's housing growth aspirations; and to ensure that there is sufficient flexibility within the plan to cater for any non-delivery of sites and to ensure the Plan delivers on the established minimum housing need. Ensuring sufficient flexibility is particularly important in the context of a Plan where existing commitments and new allocations are focused on larger strategic sites within and around the Norwich Urban areas, which can take longer to come forward than expected.</p> <p>We consider it is important that the increase in allocations is distributed more evenly across the hierarchy to ensure diversity, choice and competition in the market for land and to safeguard the delivery of the increased new allocations overall. Such an approach will also allow continued support for local services and community facilities in the village clusters and in doing so will ensure support for thriving rural communities.</p> <p>Having regard to the above, and assuming that the new allocations figure was to remain the same as currently set out at D of Table, we would consider that the distribution of new allocations should be as follows to accord with the percentage proportionate distribution at the time of Regulation 18 Stage C consultation:</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The chosen strategy includes an element of windfall provision. The strategy aims to maximise the use of brownfield sites and provides appropriate amounts of growth at different parts of the settlement hierarchy to both support existing services and to provide flexibility to deliver the wide range of different types of housing to meet varied needs.</p>	No change to the plan

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>Norwich Urban Area – 5,994 (56%) Main towns – 1,713 (16%) Key service centres – 696 (6.5%) Village Clusters – 2,301 (21.5%) split proportionately: - Remaining parts of Broadland - 658 - South Norfolk – a minimum of 1,643</p> <p>Meanwhile, with the application of a buffer of 20% to the minimum housing needs figure and exclusion windfall sites in line with our comments above, a new allocations figure of 11,957 would be spread across hierarchy as follows (in accordance with the above percentages): Norwich Urban Area – 6,696 (56%) Main Towns – 1,913 (16%) Key service centres – 777 (6.5%) Village Clusters – 2,571 (21.5%) split proportionately: - Remaining parts of Broadland – 735 - Village Clusters – a minimum of 1,836</p> <p>Meanwhile, our recommended distribution of housing allocations across the settlement hierarchy relates back to the percentage proportionate allocation at the Regulation 18C stage consultation draft Plan as assessed within the Sustainability Appraisal. A more even distribution of allocations across the settlement hierarchy in this way is more likely to address the objective of delivering homes. It provides for a wider dispersal of development across a large proportion of the settlements within Greater Norwich and would allow for additional growth in both towns and villages which would support existing local services and community facilities</p> <p>If it is determined that homes delivered through policy 7.5 and windfall allowance should contribute to the total housing figure, the above modifications would make the Plan sound for the reasons noted above. The approach would make for a more even distribution of allocations across the settlement hierarchy, which is more likely to address the objective of delivering homes. It would also provide for a wider dispersal of development across a large proportion of the settlements within Greater Norwich and would allow for additional growth in both towns and villages which would support existing local services and community facilities.</p>		

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Housing Growth Needs, Table 6 Establishing the Plan's total housing potential figure	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24217	Object	What modelling has been done of the cumulative growth aspirations of both Breckland and GNLP to support 22% additional growth?	The overall housing numbers are based on the standard methodology plus a buffer to ensure delivery. The numbers also take account of the 2018 household forecasts and economic growth modelling. Modelling was also done for the evidence studies water and energy studies.	No change to the plan
Housing Growth Needs, Table 6 Establishing the Plan's total housing potential figure	Mr Andrew Cawdron [12806]	24419	Object	<p>There is an overarching question as to whether the GNLP public consultation process is unsound. The GNDP Board papers and minutes of the meeting on 10 July 2020 make it clear that a Re. 18D consultation was intended from 2 November 2020 to 14 December 2020. At a subsequent Board meeting of 30 September, this was removed with progress straight to the Reg 19 consultation.</p> <p>Commentary under Reg. 19 is restricted to soundness only and therefore opportunity is denied for public representation concerning the increase in housing numbers (circa 40,000 to 49,000) to those on which the public were specifically asked to comment in the various stages of Reg. 18 consultations.</p> <p>On 16 December 2020 the Government announced that it was rescinding its consultation proposals for calculating housing requirement numbers and that the method suggested in 2017 would continue. The issue of Reg. 19 v 1.7 post-dates this Government announcement, but persists with the increase in the buffer. The Government continuance of existing methodology confirms the projected housing need to be 40,541 and negates any necessity to revise numbers from those in the Reg. 18 consultations.</p> <p>Question the SA approach to housing numbers</p> <p>There is no evidence in the Reg. 19 Sustainability Appraisal that land allocation has been selected as of the least environmental value or that there is a hierarchy of sustainability compliance.</p> <p>What would have been advantageous in the most recent Sustainability Appraisal to enable proper, fair public scrutiny, would be a clear statements of additional</p>	<p>The three Regulation 18 consultations, including a draft plan with reasonable alternatives for housing sites and numbers, followed by the Regulation 19 publication stage, constitute effective consultation.</p> <p>This is believed to be a sound approach to plan-making which takes account of SA requirements and reflects consultation regulations.</p>	No change to the plan

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				benefits and/or adverse sustainability and environmental implications.		
Housing Growth Needs, 179	Mr John Hill [15088]	23714	Object	<p>Housing already delivered plus existing commitments adds up to 36,692 which is 90% of the total housing need up to 2038. This is a more than adequate provision for the time being given current certainties in a time of great change. Allocating additional specific greenfield sites in locations especially favoured by the private housing market will lead to early development pressures in those areas which will not help long term goals of sustainability, will cause further imbalance and will not be particularly helpful to central government's national objective of "levelling-up" the regions.</p> <p>Reduce the number of new greenfield allocations. Any "buffer" allowance on top of this should be based on the assumption of additional city and built-up area sites becoming available for redevelopment or conversion to residential following retail closures.</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>No phasing is included in the plan as the scale of housing need is such that a flexible approach to the timing of delivery is needed.</p>	No change to the plan
Housing Growth Needs, 179	Mr Andrew Driver [17078]	23724	Object	<p>Whilst much of the GNLP is welcome, there are some significant proposals that appear both damaging and unnecessary. The current level of proposed housing in the plan does not comply with the requirement for a "buffer" of 5%. The far higher figures included in the plan are likely to be unnecessary and therefore the plan should be revised to a level of 42,500. With the existing commitments, windfall developments and the use of the brownfield sites in and around Norwich, the housing needs for the area should be met.</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The strategy aims to maximise the use of brownfield sites and provides appropriate amounts of growth at different parts of the settlement hierarchy to both support existing services and to provide flexibility to deliver the wide range of different types of housing to meet varied needs.</p>	No change to the plan
Housing Growth Needs, 180	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns)	23429	Object	<p>We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan</p>	Correction noted and agreed	Make a minor modification to correct the figure in the final

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	Consultant) [14427]			(SNVCHAHA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.		sentence of paragraph 180 so that it now reads “These <b>1,450</b> homes are included in the allocations in Row D”.
Housing Growth Needs, 180	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23434	Object	See the same rep. above (23446) which was made to the Introduction to this section.	See response to rep. 23446 above.	No change to the plan.
Housing Growth Needs, 180	Mr Andrew Driver [17078]	23725	Object	The further 1200 houses, regrettably not clearly explained in this plan, for South Norfolk do not seem to be necessary to meet housing need. These houses will result in taking up greenfield sites or valuable farming land both of which are damaging to the economy and the environment. It would be more sensible not to allocate these potential developments as any identified will result in planning blight and harm to community wellbeing. The poor public transport and other services and facilities in South Norfolk villages means any major increase in population will put too much strain on already overburdened services.	While the around 80% of housing in the GNLP is in and around the Norwich Urban Area and the towns, some growth in villages is necessary to promote the retention of services. Further service loss will lead to more need to travel for village residents. Also, some growth in villages is needed for equity reasons so that people who grow up in a village have a reasonable expectation of being able to get a home in that village if they wish to do so. Growth in villages is located where there is good access to services to support their retention.	No change to plan
Housing Growth Needs, 180	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24218	Object	This has not been submitted with the GNLP but Breckland would like clarification on where the focus of this growth ( <i>in new settlements</i> ) would be. Cumulative growth along the A11 and A47 would put further pressures on infrastructure.	The GNLP does not allocate sites for new settlements. It does however commit to a new settlement/s in the next local plan allowing for further engagement as agreed through the NSPF.	No change to the plan.
Housing Growth Needs, 181	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23430	Object	We question the inclusion of a “contingency” site or sites, such as that at Costessey (Reg. 19 para. 181) for ‘around 800 homes’, but which we believe should also include those identified ‘to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan’ (page 15, GNDP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and “unneeded” houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is “needed”, whereby the additional or “extra” numbers are only	The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided. The plan also includes a contingency site at Costessey which with a trigger mechanism in the site allocation to allow it to come forward if there is a need.  The strategy seeks to maximise the use of brownfield sites. Although it is accepted that there is a possibility of windfall arising from likely economic	No change to the plan

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				included if actually “needed” following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.	<p>changes which the strategy will enable to come forward, the amount of additional sites this will provide is unlikely to make a significant contribution to providing sites to address housing needs.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>The scale of housing need in the area is so high that phasing is not a practical approach as it would reduce flexibility in relation to the delivery of housing.</p>	
Housing Growth Needs, 187	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24219	Object	Breckland has concerns over the location and size of this growth which is close to its borders and would impact on its own growth plans in the area and would welcome further information on the progress on these settlements	Policy 7.6 of this plan signals the intention to bring forward a new settlement or settlements through a subsequent plan/s. As per the Statement of Common Ground, the authorities will continue to keep Breckland DC informed of the progress of this work and engagement can take place through the NSPF.	No change to the plan
The Growth Strategy, 188	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23734	Object	Two sites in Aylsham brings an increase to the proposed level of development to 83% on the consultation figure – 550 homes increases the total number of homes by 15.6%. The population of the town is likely to increase by a similar figure. This increase contradicts point 188 in the Strategy section which states there should be “reasonable levels of growth in the main towns.” This increase cannot be met by the current infrastructure in the town or by improvements offered by the plans within Reg 19.	The overall level of growth in Aylsham, taking account of existing commitment and including the second site, is very similar to that for the main towns of Harleston and Diss and is significantly less than that for Long Stratton and Wymondham. Infrastructure needs to serve growth are addressed through policy 4 and appendix 1 and through site allocation policies which include a new primary school, housing for the elderly and the potential for additional parking in Aylsham.	No change to the plan
The Growth Strategy, 188	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24220	Object	Further focus on growth area which is also growth area for Breckland	As set out in other responses, GNDP growth will not be to the detriment of that planned for Breckland. The authorities will work together, as set out in a Statement of Common Ground, to ensure that economic synergies can be achieved and to lobby the utilities providers to ensure that any upgrades to water and power infrastructure required are made.	No change to the plan

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The Growth Strategy, 188	Ann Nix [19995]	24276	Object	Paragraph 188d states “The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages.” Where is the innovative approach? The best way to sustain rural communities is to ensure that they are well connected to local service centres, retail and cultural facilities, and employment opportunities. There is little sign of this in the plan	The approach to village clusters provides for sites on the edge of, or within villages which will help to support existing services and provide the opportunity for people to remain in villages.	No change to the plan
The Growth Strategy, 189	Aylsham Town Council (Ms Sue Lake, Clerk) [13265]	23741	Object	As stated under legal compliance, the residents of the town were consulted on the need for ONE site. There were concerns with Reg 18, particularly in respect of the demands it would make on the infrastructure of the town. However, to have two sites as in Reg 19 magnifies these infrastructure issues. In Reg 18 there was no mention of Aylsham having two sites and there has been no consultation with the Town Council or the residents on the allocation of two sites in Reg 19. Therefore, Reg 19 has not met the test of being justified.	The overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage.  See responses to Policy 1 and 7.2 for further information on growth in Aylsham.	No change to policy 1
The Settlement Hierarchy, 191	Hopkins Homes Limited (Mr Chris Smith, Development Planner) [14202]	24169	Object	The defined ‘Key Service Centres’ should include Mulbarton and Scole. Both benefit from facilities and good connections with nearby higher-order market towns which enable them to accommodate higher levels of growth. Mulbarton’s population of 3,500 is higher than that of over half of the currently suggested designated Key Service Centres.	The Key Service Centres have been identified through an assessment of services and facilities and are felt to be appropriate.	No change to policy 1
The Settlement Hierarchy, 192	Mr John Hill [15088]	23735	Object	The towns, key service centres and other villages have had a lot of housing growth in recent years and additional allocations will have a detrimental effect on their environment. Any new allocations made on the Norwich urban fringe should not be built before existing undeveloped, or unfinished allocations.	Appropriate levels of growth are assigned to different levels of the hierarchy reflecting service provision. No phasing is included in the plan as the scale of housing need is such that a flexible approach to the timing of delivery is needed.	No change to policy 1
The Settlement Hierarchy, Table 7 Housing growth 2018 to 2038 (figures rounded)	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24223	Object	Concerns about the Impact of cumulative growth	As set out in other responses, GNDP growth will not be to the detriment of that planned for Breckland. The authorities will work together, as set out in a Statement of Common Ground, to ensure that economic synergies can be achieved and to lobby the utilities providers to ensure that any upgrades to water and power infrastructure required are made.	No change to policy 1

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The Strategic Growth Area, 193	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24221	Object	Breckland seeks confirmation that the proposed growth from GNLP will not be at the detriment to the growth planned within Breckland.	As set out in other responses, GNDP growth will not be to the detriment of that planned for Breckland. The authorities will work together, as set out in a Statement of Common Ground, to ensure that economic synergies can be achieved and to lobby the utilities providers to ensure that any upgrades to water and power infrastructure required are made.	No change to policy 1
The Key Diagram, Map 7 Housing Growth Locations	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24214	Object	These following sites have been highlighted but not allocated, are these sites the ones proposed in Policy 7.6 e.g. GNLP0415/DR at Honingham (Honingham new settlement) GNLP4057A, GNLP1055R, GNLP4057C along A11 at Wymondham, Hethel, Spooner Row	Policy 7.6 of this plan signals the intention to bring forward a new settlement or settlements through a subsequent plan/s. As per the Statement of Common Ground, the authorities will continue to keep Breckland DC informed of the progress of this work and engagement can take place through the NSPF.	No change to policy 1
The Key Diagram, Map 7 Housing Growth Locations	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24222	Object	The Council is concerned that the cumulative growth impacts on transport, power, water supply have not been adequately addressed by the GNLP in its evidence base. BDC within its adopted 2019 Local Plan has significant growth in these areas with 4000 dwellings at Attleborough, employment growth plans for Snetterton Heath and housing and employment growth along A47 particularly at Dereham. Breckland also has concerns whether the proposed improvements on A11 and A47 will be sufficient to meet the needs of the cumulative growth from the two planned areas. Equally whether there would be sufficient Railway capacity to cope with the increased growth. Under the Duty to Cooperate, Breckland District Council would welcome the opportunity to early engagement with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas. This need for cooperation cannot be addressed via the NSPF	As set out in other responses, GNDP growth will not be to the detriment of that planned for Breckland. The authorities will work together, as set out in a Statement of Common Ground, to ensure that economic synergies can be achieved and to lobby the utilities providers to ensure that any upgrades to water and power infrastructure required are made.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Mr Magnus Magnusson [14502]	23247	Object	Land off Big Back Lane (GNLP 4058), Chedgrave should be allocated. It performs better, as shown in evidence, than sites allocated Loddon and Chedgrave.	Noted and considered in relation to the Sites Plan allocations for Loddon and Chedgrave.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Mr Magnus Magnusson [14502]	23249	Support	Support the allocation of GNLP 3003 Land off Mill Road, Reedham.	Support noted.	No change to policy 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
Policy 1 The Sustainable Growth Strategy	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23431	Object	<p>Housing Delivery</p> <p>The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high as it will not enable the delivery of sustainable development which should prioritise the use of brownfield over greenfield sites. The Government in its response to the recent Changes to the Planning System consultation appears to indicate more room for divergence from the housing needs figure derived from the standard method. This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology, and instead it could be used to set lower targets due to local circumstances and constraints.</p> <p>Delivery of such a large number of houses would make it difficult or even impossible to meet climate change targets, including the legally binding commitment to reach net zero by 2050. The number of new houses in the plan should be kept to the legally required minimum rather than inflated to the proposed levels which are far above the legal requirement or “need”.</p> <p>The location of any new housing should be reviewed in light of climate change targets and legislation, so that sites are allocated in the most sustainable locations.</p> <p>The GNLP proposes to have ‘enough committed sites to accommodate 22% more homes than “need”, along with a “contingency” location for growth, should they be required to offset any non-delivery. Additional opportunities will be provided, particularly small scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development’ (Reg. 19 GNLP Delivery Statement.) Having such a high buffer of 22% makes the GNLP unsound due to this almost certain to result in failure to meet necessary climate change targets, legislation and aspirations. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.</p> <p>It is important that prioritisation is given to the delivery of brownfield sites, in line with the Government’s stated intentions and the need to help to address climate change. If more new allocations and windfalls outside</p>	<p>The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided. The plan also includes a contingency site at Costessey with a trigger mechanism in the site allocation policy to allow it to come forward if there is a need.</p> <p>The strategy seeks to maximise the use of brownfield sites. Although it is accepted that there is a possibility of windfall arising from likely economic changes which the strategy will enable to come forward, the amount of additional sites this will provide is unlikely to make a significant contribution to providing sites to address housing needs.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>The scale of housing need in the area is so high that phasing is not a practical approach as it would reduce flexibility in relation to the delivery of housing.</p> <p>The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</p> <p>The overall housing numbers in the plan and the numbers identified for the village clusters are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19 recovery and the move to a post-carbon economy, as well as supporting the retention of services in villages. This approach to allowing for some growth in village clusters is in line with former</p>	No change to policy 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
				<p>rural settlement boundaries are permitted then it is highly likely that development will take place there rather than on urban brownfield sites, where development may not be so streamlined or cost-effective for the developer.</p> <p>There is clear and compelling evidence from historic completions that windfalls are highly likely to come forward for development, with the Reg. 19 GNLP forecasting that an estimated 4,450 resulting from windfall development will come forward during the plan period, and yet only 1,296 dwellings have been included as a windfall allowance. It would be sound to include a much higher number within this allowance, thus meaning that fewer new housing allocations would be required on less sustainable greenfield rural sites. This is also further evidence that a 22% buffer is unnecessarily high.</p> <p>We question the inclusion of a “contingency” site or sites, such as that at Costessey for ‘around 800 homes’, but which we believe should also include those identified ‘to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan’ (page 15, GNDP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and “unneeded” houses.</p> <p>A sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is “needed”, whereby the additional or “extra” numbers are only included if actually “needed” following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. This would mean that all</p>	<p>strategic approaches. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.</p> <p>It is noted that the Bioabundance challenge to the South Oxfordshire LP as described was unsuccessful and that the organisation has been required to pay the costs associated with its legal challenge to the plan.</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>new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.</p> <p>It is important that the GNLP does not over-promise by allocating large numbers of sites for housing above and beyond what is “needed”. It is clear from the current JCS that the targets set were too high, as with five years left of the JCS 31,452 commitments remain. To reach the GNLP target of 49,492 houses an average annual delivery rate of 2,458 would be required over the period 2020 – 2038. The average annual delivery rate for 2011 - 2020 was 1,841, which is significantly below what would be required as an annual average delivery-rate for the GNLP. It would be more sound to set a more realistic target figure, which would be more likely to be met: this would be easier and more likely to be achieved if the target is as low as can be permitted.</p> <p>Building regulations are not currently stringent enough to ensure that new buildings are carbon neutral. To address this, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level.</p> <p>Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council’s Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes planned for the district.</p>		
Policy 1 The Sustainable Growth Strategy	RJ Baker & Sons [19063] Cheffins (Mr Ian Smith, Director) [17591]	23486	Support	Support identification of Wymondham as one of the main towns. The growth strategy is very strongly based on the majority of housing growth (65%) taking place in the Norwich Urban Area. There may be a question as to whether the housing market can support such a high	Support noted.	No change to policy 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
				proportion of new housing being concentrated in this area.		
Policy 1 The Sustainable Growth Strategy	Mrs Janet Skidmore [19326] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23500	Object	Requested that Policy 1 includes confirmation that the circumstances identified in Paragraphs 010 and 024 of Id.2a of the Planning Practice Guidance are included in the housing target for Draft GNLP e.g. adjustments for economic growth, strategic infrastructure and to meet affordable housing needs. It is also requested that an additional contingency site is identified at Wymondham to address low housing delivery rates if that occurs in the future.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.  There is a large amount of existing commitment in Wymondham so only a limited amount of additional growth has been identified for the town.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	SERRUYS PROPERTY COMPANY LIMITED [19895] Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]	23517	Object	Policy 1 refers to settlement boundaries in the Norwich Urban Area (which includes Thorpe St Andrew) and states that housing growth will be considered acceptable within settlement boundaries. An amendment to the policy map is proposed to include Oasis Sport and Leisure Centre GNLP0540 within the settlement boundary. This is on the basis that planning permission for housing development (ref: 20151132 and 20190016) has been approved and the inclusion of this land outside of the settlement boundary will weaken the interpretation of draft policy 1 as it will not be clear what is built form of a settlement and where the countryside policies should apply.	Settlement boundaries are not being reviewed through this plan.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Noble Foods Ltd [19330] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23523	Object	It is requested that Policy 1 includes confirmation that the circumstances identified in Paragraphs 010 and 024 of Id.2a of the Planning Practice Guidance are included in the housing target for Draft GNLP e.g. adjustments for economic growth, strategic infrastructure and to meet affordable housing needs.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth.	No change to plan.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
					If the market for this additional housing does not materialise, they will not be provided.	
Policy 1 The Sustainable Growth Strategy	Taylor Wimpey [19920] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23623	Support	Support the housing target, the settlement hierarchy and the strategy directing growth to the Norwich Urban Area and Fringe Parishes area including Rackheath is supported. Support the proposed allocation of land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172)	Support noted.	No change to the plan.
Policy 1 The Sustainable Growth Strategy	Clarion Housing Group [19923] Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	23642	Object	The proposed strategy is incompatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change, and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is not thought to be suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. Furthermore, the proposed strategy is not considered suitable to deliver beautiful places or spaces. It is thought that sites GNLP0415A-G, collectively known as Honingham Thorpe, offer an appropriate opportunity to deliver growth differently, creating a truly sustainable community which paves the way for the region to become the UK leader in clean growth whilst raising the standards for design and placemaking.	The strategy seeks to maximise the use of brownfield and the most accessible greenfield sites by focussing the great majority of growth in the urban area and our towns and larger villages. It also allows for a suitable level of growth in villages to support service retention in those villages.  All housing development will be required to meet the high standards of place-making set out in policy 2 of the plan.  The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.  Policy 7.6 of this plan signals the intention to bring forward a new settlement or settlements through a subsequent plan/s.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925] James Bailey Planning Limited (Mr James Bailey, Director) [19927]	23658	Object	There is significant concern over the provisional allowance for windfall development. The over reliance the GNLP places on development from windfall sites is questionable.  There are significant inconsistencies between The Growth Strategy and the housing allocations within the GNLP Reg 19 documents, notably for the Main Towns, Key Service Centres, and Village Clusters.  This could be utilised with the site north of Tuttle Lane East, Wymondham.  Deliverability and the assessment of sites submitted to the GNLP has not been properly taken into consideration.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided. Evidenced windfall provides for a small element of the overall housing provision.  The strategy seeks to maximise the use of brownfield and the most accessible greenfield sites by focussing the great majority of growth in the urban area and our towns and larger villages. It also	No change to policy 1.

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				<p>Village Clusters are unlikely to be able to provide the adequate infrastructure necessary to maintain the levels of growth proposed within Policy 7, or in the sub area housing allocation plans.</p> <p>The Village Clusters have been set using the primary school catchment areas. Many local children may not get a place in their village school due to over-capacity, and therefore have to travel to alternate village schools. An increase in housing provision for Village Clusters will only exacerbate the necessity for additional infrastructure and reliance of private transport.</p> <p>Substantial reductions in allocations for Village Clusters should be made. Instead, increased allocations should be made to the Main Towns, especially Wymondham, as this will create the most sustainable and balanced communities.</p> <p>The masterplan strategy and associated transport strategy for land north of Tuttle Lane East, Wymondham seeks to design out and help mitigate potential adverse transport and access impacts and, in doing so, comply with the emerging policies presented in Policy 2 Sustainable Communities and Policy 4 Strategic Infrastructure of the Draft GNLP.</p>	<p>allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>There is a large amount of existing commitment in Wymondham so only a limited amount of additional growth has been identified for the town.</p>	
Policy 1 The Sustainable Growth Strategy	Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]	23672	Object	<p><b>Housing needs</b></p> <p>The Council state that the application of the standard method results in a minimum housing need across the plan period 2018 to 2038 of 40,541 homes – 2,027 dwelling per annum (dpa). However, we could not find in the Council's evidence any clarity as to which years have been used in terms of household growth and the affordability ratio. It would be helpful if the Council could provide a statement on this matter on submission of the local plan and any justification for the data used.</p> <p>It is also important to note that the application of the standard method and the resulting local housing needs assessment is the minimum level of housing needs local planning authorities are required to meet. Planning Practice Guidance states at paragraph 2a-010 that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates where there is a strategy in an area that is in place to facilitate additional growth.</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided. Evidenced windfall provides for a small element of the overall housing provision.</p> <p>Further evidence to support the housing trajectory will be submitted with the plan.</p>	No change to the plan.

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>It is therefore important to consider the City Deal agreed with Government in December 2013. This deal committed the authorities in the Greater Norwich area, in return for significant additional funding, to achieve growth above what was being planned for the area. In relation to housing the City Deal states the Councils in the Greater Norwich Area would deliver an additional 3,000 homes above the Core Strategy target of 36,820 homes by 2026. There is a shortfall in delivery of 3,477 against its commitment in the City Deal. This shortfall suggests that there will be a higher minimum level of housing need in this plan than results from the standard method. The HBF considers it to be essential that the Council continues to support the level of growth it committed to in the City Deal, and this must be reflected in the GNLP's housing requirement.</p> <p>Housing supply The HBF welcomes the inclusion of a substantial buffer between its housing requirement and housing supply. This is essential in order to ensure the plan has sufficient flexibility to meet needs in full across the plan period.</p> <p>Whilst the Council has included a housing trajectory at Appendix 6 of the GNLP we could not find included in the evidence as to when each of the allocated sites is expected to contribute to this supply. This evidence is an essential part of any local plan examination as it ensures effective scrutiny of the delivery assumptions made with regard to each site and whether these assumptions are sound. In particular it is important part of any discussion regarding the 5-year housing land supply and whether the development supporting supply in the first five years of the plan is deliverable as defined in the National Planning Policy Framework (NPPF).</p> <p>We recommend that the Council submits the more detailed evidence on supply alongside the Local Plan and reserve the right to comment at the examination in public on land supply once the relevant evidence has been published.</p>		

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Policy 1 The Sustainable Growth Strategy	Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	23688	Object	<p>The GNLP in its present form is un-sound (and quite possibly not legally compliant) because it has set the total housing potential number unnecessarily high - this is not compatible with NPPF paragraphs 148 and 149 nor does it comply with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050</p> <ul style="list-style-type: none"> <li>• Furthermore we consider the GNLP to be un-sound because it chooses to disperse a significant amount of development, a policy which also does not "chime" with the requirements of NPPF paragraphs 148, 149 and 150 and the objective of the Climate Change Act 2008 (2050 Target Amendment) Order 2019 that requires the UK to bring all Greenhouse Gas emissions to 'net zero' by 2050. Nor does it follow the guidance provided by National Planning Practice Guidance (PPG) (2019)</li> <li>• Setting the housing number so high and dispersing some development in the way the GNLP suggests also has a number of very negative consequences in regard to the landscape and the environment.</li> </ul> <p>A Sound Way Forward</p> <ol style="list-style-type: none"> <li>1) Set the Total Housing Potential at the minimum local housing need figure of 40,541. This satisfies the Government's Standard Methodology requirement.</li> <li>2) Realise that by setting the housing target at 40,541 this number of new houses could be met by a combination of: 31,452 existing commitments; 5240 completions (2018 – 20); with the balance of 3,849 houses supplied by windfall developments and Brownfield sites in Norwich. In this scenario no new allocations for housing involving Greenfield sites need be made and therefore it would not be necessary to include any village cluster sites in the plan or utilise sites that might come forward as a result of policy 7.5. The negative aspects of dispersal would be avoided.</li> <li>3) Accept that there is no need to introduce additional sites on the grounds that developers require more choice. The 31,452 existing commitments already provide an adequate supply of development land for</li> </ol>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The strategy seeks to maximise the use of brownfield sites. Although it is accepted that there is a possibility of windfall arising from likely economic changes which the strategy will enable to come forward, the amount of additional sites this will provide is unlikely to make a significant contribution to providing sites to address housing needs.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>The scale of housing need in the area is so high that phasing is not a practical approach as it would reduce flexibility in relation to the delivery of housing.</p> <p>The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</p> <p>The overall housing numbers in the plan and the numbers identified for the village clusters are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19 recovery and the move to a post-carbon economy, as well as supporting the retention of services in villages. This approach to allowing for some growth in village clusters is in line with former strategic approaches. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.</p>	No change to policy 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
				<p>many years to come and give developers all the flexibility they need in regard to site choices. Developers only build to market demand and if there is a surplus of sites they will simply “cherry pick” attractive rural sites and leave more sustainable sites land banked.</p> <p>4) Learn from past mistakes. Clearly the JCS included a housing target that was far too large – hence 31,452 un-built commitments remain with only 5 years left on the plan. This time the GNLP should set a realistic target – 40,541 is probably already too large.</p> <p>5) Concentrate development in and around Norwich. This is the best way to reduce greenhouse gas emissions. Setting a lower total housing potential makes this locational approach feasible.</p> <p>6) Future proof the plan - Post Covid and Post Brexit things will be very different. Trends towards home working and internet shopping are leading to a reduction in the need for office and retail space in the city centre. In order to revitalise the city centre incorporate in to the GNLP the ever increasing potential for converting redundant office and retail space in to residential use. This is a sound approach NPPF paragraph 148 encourages: “the reuse of existing resources, including the conversion of existing buildings”. This kind of conversion could provide a large number of new dwellings in a sustainable location and take pressure of development in the countryside. The GNLP is possibly un-sound because it has not fully explored the potential for this kind of conversion.</p> <p>7) Realise that the 5,000 houses included in the Total Housing Potential to provide an opportunity for extra capacity should the 2018 ONS household projection figures become reality could be treated as phased development i.e. even if sites for these houses are allocated they need only be brought forward for development if required. In this phased approach Brownfield sites should be prioritised. This way the GNLP will have soundly demonstrated that it is aware that the ONS 2018 projections may require this additional provision but also that it acknowledges the fact that this provision will only need to be brought on stream if the projections prove to be accurate.</p>	<p>Government has indicated its intention to introduce revised Building Regulations to require greater energy efficiency in new homes. The GNLP currently includes measures to promote energy efficiency in policy 2 which seem likely to be superseded by the revised national standards.</p>	

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				<p>8) Listen to parish councils who know what their residents want. For example in Hempnall the Parish Council considers the amount of new housing currently projected for the village, resulting from the JCS site south of Bungay Road, the affordable housing scheme that the parish council seeks to implement in conjunction with Saffron Housing at Millfields and from likely windfalls – totalling approximately 45 to 50 houses - is the right amount for the village (a 10% increase over current housing numbers). Therefore we do not want any of the sites put forward by landowners for inclusion in the GNLP to be allocated in the plan. We would also like our policy that all development be restricted to inside the current development boundary to be honoured except in regard to the provision of a rural exception site for affordable housing.</p> <p>9) Provide affordable housing in villages via Rural Exception Sites. The Parish Council in conjunction with Saffron has plans to build affordable housing near Millfields. The site is owned by South Norfolk Council and they have asked for its inclusion in the GNLP as an allocated site. If their request is granted it will prevent its classification as an exception site and our affordable housing scheme will be lost. We ask that SNC complies with NPPF 77 which says: “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs”. Rural exception sites enable local affordable housing requirements to be fully met. Reliance on market schemes fails to achieve this objective. For example the 23 house JCS development south of Bungay Road was originally intended to include 7 affordable houses. Through the use of viability studies the developer has managed to reduce this in stages to just one (7 then 5 then 3 now 1).</p> <p>10) Lobby central government to insist on carbon zero building standards at the earliest opportunity. As things stand currently the GNLP, for much of its 20 year plan period, will not operate in an environment where the highest standards are required.</p>		

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				The value of the countryside and green spaces to the well-being of all has been revealed throughout the Covid-19 pandemic. The Countryside deserves stronger protection in the GNLP than is currently on offer.		
Policy 1 The Sustainable Growth Strategy	Mr John Hill [15088]	23738	Object	The housing proposals are not sustainable in their totality or in their distribution for the reasons given in my responses to 162,176,179 and 192.	Objection noted and responded to above.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Glavenhill Ltd [19356] Lanpro Services Ltd (Mrs Beccy Rejzek) [16106]	23818	Object	Too great an emphasis is placed upon dispersal of growth to as yet unidentified sites in rural cluster villages in South Norfolk and to towns like Diss and Harleston, outside of the Cambridge-Norwich Tech Corridor and the Strategic Growth Area.  Housing numbers should be redirected from Diss, Harleston and the South Norfolk rural cluster villages to a new settlement at Hethel. The policy should include the identification of a new settlement at Hethel. This approach would clearly support the ambition to provide most new homes in and around Norwich and within the Tech corridor and would provide land and homes to expand and support the opportunity for hi-tech engineering jobs within the Tech corridor.	The strategy seeks to maximise the use of brownfield and the most accessible greenfield sites by focussing the great majority of growth in the Norwich urban area, our towns such as Diss and Harleston and larger villages. It also allows for a suitable level of growth in villages to support service retention in those villages.  There is a large amount of existing commitment in Wymondham so only a limited amount of additional growth has been identified for the town and nearby Hethel.  Policy 7.6 of this plan signals the intention to bring forward a new settlement or settlements through a subsequent plan/s.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Mr Magnus Magnusson [14502]	23937	Object	Land at Pound Lane, Blofield (GNLP4013) ought to be included in the GNLP as an allocation. At the very least, the site ought to have been considered as a 'reasonable' alternative and assessed as such within the context of the SA/SEA processes as it is demonstrably 'suitable' as evidenced via the HELAA.	Noted in relation to the policy 7.3 and the Sites Plan.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	23939	Object	We are concerned about the scale of development proposed for village clusters and the additional 5000 homes, on top of existing commitments.  Paragraph 384 on village cluster sites states that "the village clusters cover the remaining areas of Broadland outside the Norwich fringe, main towns and key service centres", implying that the village clusters are not well serviced by shops, services and public transport, raising concerns that these housing developments will be highly car dependent. This aspect of the policy doesn't seem to be compatible with your objectives to significantly	Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.	No change to policy 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
				<p>reduce carbon emissions and give communities good access to jobs, services and facilities.</p> <p>The plan does not provide any specific measures to prevent these housing developments from being car dependent in use.</p>		
Policy 1 The Sustainable Growth Strategy	Robert Gower [19504]	23948	Support	The Policy 1 approach to windfall housing growth is supported as it provides flexibility to respond to higher economic growth and opportunities for self and custom build housing in accordance with the NPPF's recognition of the important contribution of small sites (NPPF Paragraph 68) and those wishing to build or commission their own homes (NPPF Paragraph 61).	Support noted.	No change to the plan.
Policy 1 The Sustainable Growth Strategy	Salhouse Parish Council (Clerk at Salhouse) [19774]	24055	Support	<p>Under Policy 1 - The Sustainable Growth Strategy, the housing growth over the 20 years is split across 4 key areas, with the fourth, "Village Clusters" where Salhouse sits, itself split into two parts (being "Broadland" and "South Norfolk").</p> <p>In the "Village Clusters" group they are looking for 4220 homes in the 20 years from 2018; the "Broadland" split accounting for approx. 38% of those (1628no.). Of that, 1146 are already identified as a "deliverable commitment" - which is taken to mean they have approved sites to develop. So that leaves just 482 homes across 20 years spread across all of the Broadland "village clusters" – although the analysis does not give a clear indication of the number of these clusters.</p>	Support noted. Policy 7.4 and appendix 5 identify that 12 homes should be provided in Salhouse through the Sites Plan	No change to the plan.

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Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p>This objection is in support of a site at Rightup Lane, Wymondham.</p> <p><b>Procedural Issues</b></p> <p>The GNLP departs from some of the Agreements in the NSPF. As such the engagement has not been effective or ongoing and the duty to cooperate has not been met. For example:</p> <ul style="list-style-type: none"> <li>• The planned job growth of the GNLP is not matched by a corresponding housing requirement contrary to the third bullet point of Agreement 3.</li> <li>• The economic needs of the GNLP have been informed by the forecasts of Experian rather than the forecasts of the EEFM upon which it was agreed economic needs would be assessed in the NSPF.</li> <li>• The GNLP does not set a housing requirement sufficient to address the housing needs of the City Deal contrary to Agreement 13.</li> <li>• The GNLP does not make sufficient provision of homes for the elderly and students contrary to Agreement 14.</li> </ul> <p>It will therefore be necessary to supplement the evidence to demonstrate that the engagement has been effective and ongoing since June 2019 and that all of the newly arising evidence has been taken into account if that is the case. Assuming it is, it will then be necessary to modify the GNLP to accord with the Agreements including by setting housing and employment land requirements which are compatible, uplifting the housing requirement to respond to the City Deal, uplifting the housing requirement to respond to the needs of specific groups and allocating sites to meet the needs of specific groups.</p>	<p>The GNLP takes account of the NSPF. Specifically, in relation to the issues raised:</p> <p>Housing growth matches anticipated economic growth, which in turn takes account of a range of economic forecast data and includes growth anticipated through the City Deal;</p> <p>Housing for the elderly and students is to be provided both on allocated sites and through criteria-based policy 5 (Homes).</p>	No change to the policy 1.

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Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Housing Requirement</b></p> <p>The GNLP is ambiguous and there is no housing requirement set out in strategic policies. If the figure of 40,541 homes is to provide a housing requirement, it will be necessary to</p> <p>(1) modify the wording of the foreword to state that the GNLP provides for the delivery of around 49,500 homes rather than a housing requirement of around 49,500 homes,</p> <p>(2) modify Policy 1 to set a housing requirement rather than the housing need,</p> <p>(3) modify para. 177 and table 6 to identify a housing requirement rather than housing target (4) modify Appendix 6 accordingly.</p>	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.	No change to the policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Housing Need</b></p> <p>Appendix 6 indicates that the five-year land supply will be calculated against the housing target of 40,541 homes rather than against the housing requirement alluded to in the foreword or against the housing need identified in a strategic policy, namely 40,550 homes in Policy 1. The assessment Greater Norwich Local Plan Submission Draft 2021 Page 6 of the five-year land supply against the housing need rather than a housing requirement set out in a strategic policy is not consistent with paragraph 73 of the NPPF.</p>	As above. The approach taken in the GNLP of assessing the 5-year land supply against housing need rather than the higher figure the plan provides for is considered to comply with NPPF requirements.	No change to the policy 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
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>The minimum housing need</b></p> <p>The standard method has been miscalculated and that the minimum local housing need is greater at 41,388 homes.</p> <p>The identified housing need does not accord with the minimum set by national policy and does not take account of the needs of specific groups. The quantitative elements of the Spatial Strategy will need to be revised to ensure that housing needs can be met across the GNLP area. This should be achieved through directing more growth to some of the Main Towns and Key Service Centres to counterbalance the levels of growth proposed in the Norwich urban area.</p>	The housing need figure is considered to be correctly calculated using the standard methodology which applied when the Reg. 19 plan was produced. This figure has now reduced slightly due to the publication of up to date affordability data. Nevertheless, the figure is regarded as robust as data will change over the time it takes to produce a plan. Housing for specific groups is to be provided both on allocated sites and through criteria-based policy 5 (Homes). The strategy seeks to maximise the potential of brownfield sites in the urban area and is sound.	No change to the policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Communal Accommodation</b></p> <p><b>Students</b></p> <p>Assuming that student numbers remain constant at NUA and that there is no further growth following 2036 at UEA, there would be a need to increase the minimum local housing need by 1,644 homes from 41,388 to an equivalent of 43,032 homes over the plan period. It should be recognised that this need should be met through an appropriate combination of student accommodation and housing.</p> <p><b>Older People</b></p> <p>To respond to the needs of the older population in communal establishments there is a need for the equivalent of an additional 987 homes which would provide a minimum housing requirement for 44,024 homes. This need should be met through an appropriate combination of student accommodation, communal establishments and housing.</p>	Housing for the elderly and students is to be provided both on allocated sites and through criteria-based policy 5 (Homes).	No change to the policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>The City Deal and SHMA</b></p> <p>A shortfall of 3,704 homes should be addressed as soon as possible to achieve the objectives of the City Deal. It is therefore necessary to set a plan period housing requirement of at least 44,024 homes including a stepped housing requirement.</p>	The government's standard methodology, along with the higher housing provision figure in the plan to ensure needs are met, takes account of the City Deal and the SHMA.	No change to the policy 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
				The SHMA for Central Norfolk of June 2017 also provides support for a minimum local housing need of at least 44,024.		
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Previous levels of delivery</b></p> <p>To facilitate the significant boost to housing supply required by paragraph 59 of the NPPF it will be necessary to uplift the housing requirement to a figure significantly in excess of 2,385 homes per annum achieved in the last 5 years, which is significantly in excess of 47,704 homes over the plan period.</p>	The government's standard methodology, along with the higher housing provision figure in the plan to ensure needs are met, takes account of the recent delivery.	No change to the policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Contingency</b></p> <p>Typically, a 5 % contingency is applied in local plans. Historically, the trajectory of Greater Norwich overestimates the developable supply by circa 23.7%. It is therefore necessary to identify a housing requirement which is significantly more than 5% in excess of the housing need.</p> <p>Based on the accuracy of previous trajectories in Greater Norwich it would be necessary to identify a supply 23.7% in excess of the minimum housing need, which would require a supply of 18,847 homes during the period 2020-26 and a supply of 29,120 homes during the period 2026-38, which in addition to completions would require a supply of 53,207 homes.</p> <p>Recommendation: In order to ensure that the minimum housing need is met it is necessary to set a housing requirement for 16,001 homes from 2020-26 and for 24,722 homes from 2026-38. – contradicts above, or not with completions?</p>	The government's standard methodology, along with the higher housing provision figure in the plan to ensure needs are met, takes account of the need for a contingency buffer.	No change to the policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Employment</b></p> <p>EEFM footnote 54 from 2010</p> <p>Table 25 of the Avison Young addendum indicates that 7,754 of the total of 33,000 jobs will be within former B-use classes and that it would be necessary to deliver 76.4ha of former B-use employment land to accommodate these. The GNLP over-allocates former B-use class of 283.6ha relative to need. Paragraph 289 suggests that this over-allocation provides for a number of issues including supporting more ambitious levels of jobs growth if demand can be stimulated. The GNLP therefore supports a potentially significant over-delivery</p>	The government's standard methodology, along with the higher housing provision figure in the plan to ensure needs are met, takes account of employment growth needs.	No change to the policy 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
				<p>of employment land leading to a higher housing requirement or more in-commuting.</p> <p>Accordingly, an appropriate monitoring framework should be put in place to ensure that a sufficient number of homes are provided to accommodate the growth in the workforce and to avoid the resultant environmental harms of a greater dependency on long distance commuting flows. If the monitoring framework indicates that a greater number of jobs have been accommodated than the growth in the resident workforce such that the economy of the area becomes more dependent upon unsustainable long-distance in-commuting flows, this should trigger an immediate review of the GNLP alongside a policy response with residential planning applications being considered more favourably until such time as the GNLP review is adopted to address the imbalance.</p>		
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Dependent Plans</b></p> <p>The paragraph following the table in Policy 1 should be amended to make it clear that there remains a need to allocate 250 homes at Diss and 1,200 homes in the South Norfolk Village Clusters in addition to the allocations in the GNLP and to set the scope for the preparation of these daughter documents. Whilst it may be appropriate to defer meeting needs to the Diss Neighbourhood Plan or the SNVCHSAP, the GNLP cannot justifiably rely upon the delivery of the potential sites which will not be tested as part of the GNLP.</p> <p>To address the policy vacuum that arises from the current absence of such documents it is necessary to set out clear Development Management policies for residential planning applications in the South Norfolk Village Clusters. However, given that some development is facilitated in Diss through the GNLP which may meet needs in the short-term, it is considered that it is necessary to identify a timescale for the making of the Diss Neighbourhood Plan to ensure that the medium term needs are appropriately responded to and if this timescale is not achieved then to set out how residential planning applications will be considered from then on.</p>	<p>Para 180 already addresses the first paragraph.</p> <p>The GNLP is divided into Strategy and Sites. This is the strategy section so is justified. Further evidence will be submitted to show that sufficient sites are available to meet needs. DM policies are not being superseded so do exist, thus addressing this point as there will be no policy vacuum.</p>	No change to the policy 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
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24071	Object	<p><b>Distribution of growth</b></p> <p>The strategy represents a significant shift towards urban living compared to the current position. There is no justification or evidence in support of this policy decision which is likely to have significant implications on the sustainability of the plan area. This strategy will result in households that would otherwise have met their housing needs across other parts of the plan area moving to Norwich in the absence of any alternative. The resultant diversion of households, their patronage and their disposable income to Norwich is likely to compromise the vitality of rural communities.</p> <p>The disproportionate levels of delivery proposed in the Norwich urban area will be challenging to deliver, as reflected in the SA.</p> <p>In order to provide a deliverable and effective GNLP and to provide sufficient flexibility in accordance with paragraph 11a of the NPPF including to respond to the lower levels of delivery that will actually be achieved in the Norwich urban area, it will be necessary to identify a sufficient range and choice of sites by allocating more housing to some of the Main Towns and Key Service Centres.</p> <p>The role of such settlements is likely to have become even more integral to the sustainable operation of the GNLP area as a result of the current pandemic as :</p> <ul style="list-style-type: none"> <li>• There has been a significant increase in home-working with workers spending their working days at home in the Main Towns and Key Service Centres with a greater reliance on local services, facilities and infrastructure.</li> <li>• Households are seeking homes with greater access to open space and the countryside.</li> </ul>	The strategy provides a range of sites in different types of locations and at different scales providing for a range of needs and choice for the market. In seeking to maximise the potential of brownfield sites in the urban area it is in line with national planning priorities.	No change to the policy 1.
Policy 1 The Sustainable Growth Strategy	Bidwells (Mr Iain Hill, Partner) [16273]	24081	Support	<p>The GNLP's approach to providing choice and flexibility in terms of housing growth by accommodating 22% more homes than are needed is supported.</p> <p>The buffer will help maintain the supply and delivery of housing in accordance with the NPPF and specifically the Government's objective of encouraging authorities to consider more growth than required to meet local housing need, particularly where there is potential for significant economic growth.</p> <p>The proposed Settlement Hierarchy is fully supported. Norwich and the Urban Fringe, which includes</p>	Support noted	No change to policy 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
				<p>Taverham, is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing. Accordingly, it is wholly appropriate and consistent with Government Guidance that it should be identified as the preferred location to accommodate 66% of the housing growth during the period to 2038.</p> <p>On this basis, the proposed the Policy is considered to be sound.</p>		
Policy 1 The Sustainable Growth Strategy	Bidwells (Mr Iain Hill, Partner) [16273]	24091	Support	<p>The GNLP's approach to providing choice and flexibility in terms of housing growth by accommodating 22% more homes than are needed is supported.</p> <p>The buffer will help maintain the supply and delivery of housing in accordance with the NPPF and specifically the Government's objective of encouraging authorities to consider more growth than required to meet local housing need, particularly where there is potential for significant economic growth.</p> <p>The proposed Settlement Hierarchy is fully supported. Norwich and the Urban Fringe, which includes Taverham, is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing. Accordingly, it is wholly appropriate and consistent with Government Guidance that it should be identified as the preferred location to accommodate 66% of the housing growth during the period to 2038.</p> <p>On this basis, the proposed the Policy is considered to be sound.</p>	Support noted.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24100	Object	<p>This objection is in support of LAND NORTH OF BRECKLANDS ROAD, BRUNDALL.</p> <p>The main issues raised in relation to procedural issues and policy 1 are the same as set out above in rep ID 24071 on a site at Rightup Lane, Wymondham, with the addition of the following on process:</p> <p><b>Taking representations into account</b></p>	Discussions have been ongoing with the site promoters on this issue. Re-assessment taking account of the proposal to include a primary school on the site has not changed the overall conclusion that the site should not be allocated. Norfolk County Council has confirmed that additional school facilities have been planned for elsewhere in the area.	No change to policy 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
				<p>Pigeon and their Landowners previously made representations in support of the allocation of Land north of Brecklands Road, Brundall to the Greater Norwich Draft Local Plan Regulation 18 consultation in January 2020.</p> <p>Pigeon has been informed by the Greater Norwich Local Plan team that mistakenly these were not taken into account during the preparation of the Pre-Submission Draft Strategy. As such the Pre-Submission Draft Strategy has not been prepared in accordance with Regulation 18(3) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which requires that the local planning authority must take into account any representations made to them.</p> <p>Recommendation: As a minimum, it will therefore be necessary for the GNLP to be reviewed to ascertain whether the Pre-Submission Draft Strategy would have been different had these representations been taken into account, including for example through the allocation of the Land north of Brecklands Road. It will also be necessary for the allocation or non-allocation of this site to be explained taking account of the previous representations as has been done for other sites, and for Pigeon to be provided sufficient opportunity to respond to this prior to submission.</p>		
Policy 1 The Sustainable Growth Strategy	Mr Bryan Robinson [14521]	24107	Object	<p>My concerns regarding the inadequacy of the GNLP are tempered by the potential consequences of a free-for-all land grab if the plan is rejected and the JCS is considered out of date.</p> <p>The residents of Greater Norwich have been badly let down in getting to this position for a plan which commenced in 2017 but will be concerned that the consequences of rejection of the plan on submission for inspection may be worse than those of accepting a substandard version.</p> <p>The only solution I can see is to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic; remove the NWL from the plan and tighten up the</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The focus of growth in the A11 corridor, which has been carried forward from the JCS, reflects evidence that the main growth prospects are in high</p>	No change to policy 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
				<p>policies and targets for the environment and climate change before submission to the Inspector for approval.</p> <p>It is acknowledged that this may delay the submission but this would be less disruptive than rejection or a lengthy process of amendments later.</p> <p>The growth ambitions for Greater Norwich have been severely weakened by the Budget announcement of the selection of Felixstowe as a Freeport which will cover a radius of 25 miles and encompass several major employment areas which will have the advantage of several business incentives and will be competing commercially with Greater Norwich and its associated export/import outlets of Great Yarmouth and Norwich Airport.</p> <p>Sadly the omission of upgrading the sub-standard northern section of A140 between Norwich and Ipswich and concentrating employment to the A11 Norwich to Cambridge corridor is likely to mean that Norwich will not be part of this growth generated by Freeport East.</p>	tech businesses which are already located in this area and have the potential for further growth.	
Policy 1 The Sustainable Growth Strategy	Woods Hardwick Planning Ltd (Paul Woods) [19974]	24113	Object	The issues are the same as those raised through rep. 24114 summarised above.	Noted.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24120	Object	This representation is in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R). The main issues raised in relation to procedural issues and policy 1 are the same as set out above in rep ID 24071 on a site at Rightup Lane, Wymondham	See response above re Rightup Lane Wymondham.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Mrs Janet Hill [16030]	24154	Object	<p>GNLP envisages significant growth in the population of around 16% between 2018 and 2038. The basis of the development plan has to be supported by 'sustainability principles'.</p> <p>There are water shortage problems in Norfolk, and East Anglia. There is no indication in the GNLP as to how this situation will be addressed and habitats protected in line with Habitats Regulations.</p> <p>Paragraph 162 of the Sustainable Growth Strategy seeks to promote Norwich as a key growth area to</p>	<p>It is not accepted that it is not possible to have growth and to simultaneously protect the environment. The plan aims to do that by:</p> <ol style="list-style-type: none"> <li>1. Ensuring development is water efficient to contribute to Anglia Water's strategy to provide water resources sustainably to meet growth needs.</li> <li>2. Providing for the growth needs of Greater Norwich locally – these cannot be met elsewhere in the country.</li> </ol>	No change to policy 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
				<p>support the development of the national economy. It states that both greenfield and brownfield sites will be developed. The aims of the policy are fundamentally in conflict and cannot be reconciled. It is not possible to achieve large scale growth and protect and enhance the environment.</p> <p>The fundamental tenant of sustainability is that it should not damage or harm the environment in a manner which will result in cumulative net adverse impacts. The choice of a largely un-developed rural county to be targeted for large scale development and growth in preference to other areas of the Country which are already developed / damaged, and in need of regeneration / already have unemployment figures which suggest an underemployed workforce is again contrary to sustainability principles.</p> <p>Other areas of the country are much better connected, have better existing infrastructure and clearly will have significantly lower adverse environmental impacts from development than those proposed in the GNLP. No sequential test to compare or even consider these issues is contained in the Plan, and therefore it fails the test of sustainability on this account.</p> <p>Large scale development as proposed will require responses in the form of new infrastructure and services. These needs are referenced but not quantified and planned for within the GNLP and there are no indications where or specifically how they will be provided for although broad references to various sources of funding (none specific) are referred to. To propose large scale migration and development without ensuring that the means to support it are present and will be adequate / appropriately located is again risking an unsustainable community development and contrary to sustainability principles.</p> <p>Under the Habitats Regulations, there is a requirement that development should not harm habitats protected by the Regs. There are numbers of sites within a short distance of the GNLP area – the Broads and North Norfolk Coast – which will be significantly impacted by increased population growth. There is no detailed assessment in the GNLP of the impacts on Protected Habitats, supported by empirical evidence to assess the impacts, or the value of proposed mitigation measures.</p>	<p>3. Planning for the infrastructure needed to serve growth. This will be provided by a range of organisations and through developer contributions (see policies 2 and 4)</p> <p>4. Addressing the impacts of growth on protected habitats, partly through a tariff on development (see policy 3).</p>	

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				Commuted sums from some developments within a close radius of a specific site may have some offset capability to address impacts but this will be large scale, large area impacts which cannot be offset by commuted sums. Therefore the population growth projected will adversely impact on Protected Species and Habitats. Population growth allowed for in the Plan therefore exceeds that which can be supplied without harm to Habitats and Species and is contrary to sustainability principles and legislative requirements		
Policy 1 The Sustainable Growth Strategy	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24155	Object	<p><b>Housing Requirement</b></p> <p>The housing requirement proposed by the plan falls short of adequately reflecting the growth deal requirement by approximately 8,500 homes (as set out in the SHMA 2017). In which case the housing requirement for the GNLP should be increased to approximately 49,000 dwellings. We also concur, however, with the assessment put forward by DLA / Turley in our client's Silfield Garden Village representations that a new Housing and Economic Needs Assessment should be undertaken prior to the submission of the GNLP. The SHMA 2017 is now dated and urgently needs refreshing in order to inform the level of growth needed during the whole plan period.</p> <p>The GNLP fails to allocate sufficient short-term deliverable housing sites to meet the (JCS) growth requirements to <b>2026</b>. There is therefore a requirement to identify and allocate additional sites that can be delivered within the next 6 years to meet this shortfall.</p> <p>Broadly supportive of the proposed settlement hierarchy, but has significant concerns regarding the appropriateness and sustainability of the proposed distribution of housing growth.</p> <p>Compared to existing commitments, the strategy for new allocations focusses a significantly higher proportion of growth to the village clusters (increased from 7% of existing commitments to 16% of new allocations), broadly similar levels of growth to the main towns (increased from 14%-15.5%) and key service centres (decreased from 8 to 6.5%) and</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>Policy 7.6 of this plan signals the intention to bring forward a new settlement or settlements through a subsequent plan/s.</p>	No change to policy 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
				a significant decrease in growth directed to the Norwich urban area (decreased from 71% to 62%). Object to this change of focus as it is clearly contrary to professed aims of the GNLP's Climate Change Statement to deliver growth in sustainable locations that reduce the need to travel.		
Policy 1 The Sustainable Growth Strategy	Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	24177	Support	Policy 1 introduces flexibility to accommodate additional growth if the housing needs of the Local Plan area change. It is therefore essential that this flexibility extends to other policies of the Local Plan, specifically those that allocate sites for development. This will ensure that any changes to the growth predictions in the Local Plan can be accommodated by increasing development yields at sites that have already been identified as sustainable without the need to rely on sites in potentially less sustainable locations. It will also mean that the plan is positively prepared and accords with the requirement of the NPPF to boost the supply of new homes by making the most efficient use of land in the most sustainable locations.	Support noted.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Pegasus Group (Mr Robert Barber) [19984]	24183	Object	Rep. re Norton Road, Loddon site  <b>Housing requirement</b>  The foreword to the Draft Local Plan identifies a "requirement" for about 49,500 homes over the period 2018-38. Paragraph 177 and Table 6 of the GNLP however identify a housing "target" for only 40,541 homes and Policy 1 identifies a "need" for around 40,550 homes.  The GNLP is therefore not only ambiguous such that it may not be effective, it also does not accord with national policy and therefore would benefit from a set housing requirement in strategic policies.  <b>The minimum housing need</b>  The standard method has been miscalculated within the GNLP and that the minimum local housing need is greater at 41,388 homes (calculation supplied)  <b>Historic under-delivery</b>  In Greater Norwich, the housing trajectory of the Joint Core Strategy overestimates the developable supply by circa 23.7%.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.	No change to policy 1.

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				<p>The overestimations of supply can be mainly attributed to the delivery rates of strategic infrastructure projects, and consequently, the ability of large scale SUE's to be delivered across Greater Norwich. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement which is 25% in excess of the minimum need for 40,541 homes. This would produce a housing requirement for <b>50,676</b> homes.</p> <p>Welcome inclusion of a substantial buffer of over 20% between its housing requirement and housing supply. This is essential to ensure the plan has sufficient flexibility to meet needs in full across the plan period.</p>		
Policy 1 The Sustainable Growth Strategy	Pegasus Group (Mr Robert Barber) [19984]	24186	Object	<p>Rep. re Dairy Farm, Thorpe End site</p> <p>The main issues raised in relation to policy 1 are the same as set out immediately above in rep ID 24183.</p>	See response to rep. ID 24195 above.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24195	Object	<p>Rep. in respect of land south of Green Lane, Horsford (site ref. GNLP2160).</p> <p><b>Housing need v requirement</b></p> <p>The Plan does not establish the 'housing requirement' contrary to Government guidance that (ID: 2a-002-20190220). The Standard Method Local Housing Need figure does not produce a housing requirement figure. The terms used in the Foreword and policy 1 are incorrect in this respect.</p> <p><b>Level of housing requirement</b></p> <p>The Standard Method Local Housing Need provides the minimum starting point in determining the number of homes needed in an area.</p> <p>Where an area is subject to growth drivers, it is appropriate to consider whether actual housing need is higher than the standard method indicates.</p> <p>The plan's approach to considering the implications of economic growth drivers as part of housing supply rather than housing need, represents a fundamental misunderstanding of the process of establishing the Local Plan housing requirement, and results in a</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The settlement hierarchy is based on a recent assessment of services and facilities in different locations.</p>	No change to policy 1.

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				<p>substantial weakening of the proposed strategy and increased risk that insufficient housing will be delivered and economic growth undermined.</p> <p><b>5-year land supply</b></p> <p>The plan fails to sufficiently demonstrate that it will be possible to demonstrate a 5YHLS on adoption of the Plan. Whilst Appendix 6 provides a high-level housing delivery trajectory, it does not include sufficient detail in relation to individual sites or their deliverability.</p> <p><b>Settlement Hierarchy &amp; Horsford</b></p> <p>The settlement hierarchy is not based on an up-to-date assessment. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it.</p>		
Policy 1 The Sustainable Growth Strategy	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24201	Object	Issues raised on housing need, requirement, 5-year land supply and the settlement hierarchy and Horsford as per rep. ID 24195 directly above.	See response to rep. ID 24195 above.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24202	Object	Issues raised on housing need, requirement and 5-year land supply and the settlement hierarchy and Horsford as per rep. ID 24195 above.	See response to rep. ID 24195 above.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24203	Object	Issues raised on housing need, requirement and 5-year land supply and the settlement hierarchy and Horsford as per rep. ID 24195 above.	See response to rep. ID 24195 above.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24224	Object	The significant cumulative growth from both GNLP and Breckland LP will require significant infrastructure planning to support both growth strategies	Policy 4 provides details on the infrastructure required to support growth. As noted in relation to other reps. from Breckland DC, the GNLP authorities will work with Breckland to lobby for the delivery of required infrastructure, particularly in relation to water and power.	No change to policy 1

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Policy 1 The Sustainable Growth Strategy	Climate Friendly Policy and Planning (CFPP) (Dr Andrew Boswell, Consultant) [12486]	24245	Object	<p><b>Housing Numbers</b></p> <p>There will be carbon leakage and shapeless place shaping via over-inflation of housing numbers between Reg 18A and Reg 19</p> <p>There has been considerable drift from the original intentions consulted upon at the Reg 18A, as described below, which we do not consider democratically accountable.</p> <p>Now GNDP have calculated a locally assessed need of 40,541 as described at GNLP Reg 19. This figure is too high as, on 16th December 2020, the Government published an indicative annual housing need figure<sup>55</sup> of 2,008 homes for the GNLP area, following their own guidance, which is 40,160 over the 20-year plan period.</p> <p>As the GNDP numbers do not agree with the Government numbers, CEPP request that the GNDP publish their calculation, and all the assumptions within it, and that subsequent updated calculations (for example, when the affordability ratios are published in March each year) are also published showing the full calculation and assumptions.</p> <p>The words “flexibility” and “choice” are used often in the GNLP Reg 19. However, such a high buffer undermines the place shaping principle of planning which NPPF 148 emphasises</p> <p>The choice provided by a buffer, which could extend to around 30%, is to loosen the strategic shape of where home building happens, so undermining the strategic nature of Policy1 .</p> <p>A further issue is the delegation of at least 1450 allocations to the South Norfolk Village Clusters Housing Sites Allocation plan, and the Diss and Neighbourhood Plan. This allows further carbon leakage from the GNLP carbon budgets.</p> <p>The 23%-33% buffer undermines achieving sustainable development under the environmental objective at NPPF 8(c), a</p>	<p>The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The calculation of the housing numbers, which has to take account of changes to data over time, but must also identify a number for examination of the plan, is set out in the text of the plan and will be further detailed at submission. Evidence updates have assessed likely Covid impacts.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</p> <p>The overall housing numbers in the plan and the numbers identified for the village clusters are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19 recovery and the move to a post-carbon economy, as well as supporting the retention of services in villages. This approach to allowing for some growth in village clusters is in line with former strategic approaches. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.</p> <p>The trajectory takes account of information provided by developers on likely delivery timings. Further detail will be provided at submission. Given the high housing need locally and nationally, phasing of</p>	No change to policy 1.

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				<p>The GNLP Reg 19 is not even sound against its own stated ambition which claims – falsely - at Reg 19, 83 that “mitigating the effects of climate change within the Greater Norwich area is a cornerstone of the GNLP”.</p> <p><b>Covid Impacts not considered</b></p> <p>The housing figures need to be reviewed against COVID impacts. We note also that the affordability ratio data, used in the Government’s indicative local housing need data59 (of December 16th) was published 19th March 2020 and new data for 2020 is due out March 2021 which in time will be reflected in an updated local housing need figure.</p> <p><b>Front loaded housing delivery trajectory</b></p> <p>The Housing Delivery Trajectory front loads build out over the next 5 years peaking at 3,349 homes in 2022/2023 against a Government assessed need of 2,008 homes. The 66% overhead against need for that year is unjustified, and especially when the long-term housing demographics are unknown, as above.</p> <p>Such high housing numbers drive carbon emissions in two ways, from embedded carbon emissions in construction and from energy and transport emissions from daily living (or “operation”).</p> <p>The Reg 19 GNLP has deferred making climate change policies that will deliver the lowest carbon homes until the next review of the adopted GNLP. This is despite Agreement 19 of the recently agreed Norfolk Strategic Planning Framework.</p> <p>By deferring climate policy to implement improvements in low-carbon build standards, whilst front loading build-out, GNDP are maximising the number of homes that will be built to the current low standards.</p> <p>Drift from Reg 18A: consultation legitimacy concerns</p> <p>At Reg 19 that GNDP have departed from the majority consultee response at Reg 18A, and their own precedent at Reg 18C, and added in windfalls as an</p>	<p>housing development is not regarded as a suitable approach.</p> <p>Government has indicated its intention to introduce revised Building Regulations to require greater energy efficiency in new homes. The GNLP currently includes measures to promote energy efficiency in policy 2 which seem likely to be superseded by the revised national standards.</p> <p>The GNLP contains policies which cover all relevant aspects of the emerging NSPF proposals for how local plans in the county should address climate change. Minor modifications to the GNLP’s Delivery and Climate Change Statement and relevant text supporting policies will be submitted to provide updates on how this emerging policy advice (in agreement 19 of draft NSPF) is addressed. This is mainly achieved through the design of development required by Sustainable Communities Policy 2. The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.</p> <p>Covid-19 impacts have been considered further through updates to the evidence base on the economy which have shown the policy approach in the plan to be robust.</p>	

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				<p>additional part of the housing buffer as a “windfall allowance”.</p> <p>The status of windfalls is still not clear as at Reg 19, 184 states “Demand will determine whether windfall development is instead of, or in addition to, allocated growth.” This implies that it is not yet known if the “windfall allowance” is required or not.</p> <p>The GNLP Reg 19 draft plan goes far beyond what the public were asked at question 5 and question 6 on the Reg 18A Growth Options consultation, and in introducing a “windfall allowance” at this stage has undermined in own precedents at Reg18C and doubt at Reg 19, 184.</p> <p><b>Embedded Emissions</b></p> <p>A “better practice” Whole Life Cycle Carbon (WLC) policy (as adopted in the London Plan) and housing numbers constrained to government projections should be included in the GNLP to reduce the embedded carbon footprint.</p> <p>3MtCO2 could be saved on the GNLP housing to 2038 by dispensing with overinflated housing numbers and following government assessed need instead, early introduction of Whole Life Cycle assessments and early elimination of fossil fuel heating.</p>		
Policy 1 The Sustainable Growth Strategy	Barton Willmore (Joshua Mellor, Senior Planner) [16965]	24249	Object	<p>The Spatial Strategy is considered to be unsound for three distinct reasons:</p> <ol style="list-style-type: none"> <li>1. An additional 2,049 homes need to be allocated to account for a 20% buffer and to reflect the City Deal.</li> <li>2. The focus of additional growth, particularly by way of new allocations, is outside of the most sustainable corridor between Cambridge and Norwich. The strategy to accommodate further growth to the Northeast of Norwich, and a further 1,417 dwellings at Taverham is clearly in locations that are (a) outside of this key growth corridor; (b) not served by as wide a range of public transport and sustainable travel routes into Norwich, or Cambridge; and (c) the sites selected have not delivered housing as planned to date (see 3 below). There are also concerns over the deliverability of the East Norwich regeneration area and the amount of growth the strategy</li> </ol>	<p>The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>There is a large amount of existing commitment in Wymondham so only a limited amount of additional growth has been identified for the town.</p>	No change to policy 1.

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				<p>provides for in village clusters (taken together, the village cluster allocations alongside Policy 7.5 expectations are identified to deliver 2,482 dwellings above existing commitments – which equates to 23% of all additional housing need allocated in the GNLP. This is more than the additional allocations proposed for the Main Towns and Key Service Centres together).</p> <p>There are also concerns over the approach to windfall, both in terms of policy 7.5 and the use of windfall in the housing requirement.</p> <p>A policy should be identified to highlight the importance of the Cambridge – Norwich tech Corridor, to ensure consistency with national policy, and to ensure development in that area is effective at delivering housing in that area, so as to make the greatest possible contribution to housing requirements across the GNLP;</p> <p>3. There is no evidence from Statements of Common Ground with regard to the anticipated levels of delivery and/or viability of the current site allocations, or the extended site allocations that is sufficient to determine whether the allocations within the Spatial Strategy themselves are justified, or whether they would be effective in delivering the housing needs of the GNLP.</p> <p>The additional homes that are identified as not being justified, or effective, will need to be redistributed to the most sustainable locations within the settlement hierarchy, where there is a history of delivery, such as Wymondham.</p> <p>The plan should focus growth on deliverable sites outside of Norwich on the most sustainable corridor (the A11 Cambridge – Norwich Tech Corridor). As a location with far more services and employment than other main towns, Wymondham should be classified as a “Large Main Town” and accommodate significantly more growth. Wymondham is one of the most sustainable locations which can achieve the growth required by the GNLP, with good access to public transport and the major road network, facilities and services and existing employment opportunities.</p> <p>In addition, Wymondham is a location which can support a broad range of homes, including</p>		

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				<p>family homes, as opposed to development within the urban area of Norwich which will be unlikely to deliver housing tailored to need (e.g. a reliance on flatted development to achieve density requirements). The Strategic Housing Market Assessment (SHMA, 2017) identifies 81% of the housing need is for houses. The SHMA is now considerably out-of-date, especially in light of the COVID-19 pandemic which is influencing homeowners to favour houses with gardens as opposed to flats without.</p> <p>The promoters' site at North East Wymondham would provide the full affordable housing requirement, a local centre, primary school, land for the relocation of Wymondham High's Sixth Form (required strategic infrastructure) and significant areas of open space including the creation of a new Country Park. A forthcoming application, due to be submitted in Spring 2021, demonstrates the site is wholly suitable for the proposed development, and could meet a significant portion of the 5,825 homes we believe is currently unmet, or unjustified/effective in the emerging GNLP.</p>		
Policy 1 The Sustainable Growth Strategy	Rosconn Group (Ben Ward, Senior Planning Manager) [19994]	24261	Object	<p><b>Housing Requirement</b></p> <p>The housing requirement should be greater than the minimum housing need figure, so that it is consistent with the NPPF's focus on significantly boosting the supply of housing and takes account of the above-trend economic growth and infrastructure improvements as set out within the GNLP and the Greater Norwich City Deal. The housing requirement within the Plan does not reflect government guidance in that it only proposes to meet the minimum starting point figure and no evidence has been provided to support why this decision has been made or why it is considered to be appropriate.</p> <p><b>Housing Supply and Delivery</b></p> <p>The Plan does not credibly establish a Five-year housing land supply contrary to the NPPF and PPG and that, contrary to the Plan's own stated approach, the deliverability and developability of projected housing completions, particularly those arising from strategic sites, has not been</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p>	No change to policy 1.

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				<p>adequately considered .</p> <p><b>Settlement Hierarchy - Main Towns and Key Service Centres</b></p> <p>There is no explanation as to what the purpose of the hierarchy is or how this has been used to inform the distribution of growth.</p> <p>Further consideration should be given to directing a greater proportion of the residual housing requirement through new allocations towards the Main Towns and Key Service Centres, particularly those that are located outside the SGA, in order to enable the sustainability benefits of housing growth to be distributed more widely and fairly.</p> <p>Settlements such as Long Stratton and Aylsham for instance play a wider role in serving a principally rural hinterland and growth can assist in maintaining and enhancing services and facilities and delivery of affordable housing to meet local needs that these wider rural communities are reliant on.</p> <p>This approach would remain aligned with the preferred growth option of directing the majority of growth around the Norwich Urban Area and within the SGA, whilst allowing a greater level of dispersal to support thriving rural communities as well as flexibility. Such an approach will also be more deliverable than the current “all the eggs in one basket” approach where almost all of the growth is directed to the Norwich Urban Area / SGA with very little being directed to highly-sustainable settlements elsewhere within the plan area.</p>		
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24266	Object	<p>This representation is in support of the allocation of Land west of Nelson Road, Diss</p> <p>The main issues raised in relation to procedural issues and policy 1 are the same as set out above in rep ID 24071 on a site at Rightup Lane, Wymondham</p>	Please see the response to rep. ID 24071 above.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling,	24278	Object	<p>This representation is in support of the allocation of Land at Walcot Green Lane, Diss.</p> <p>The main issues raised in relation to procedural issues and policy 1 are the same as set out above in rep ID 24071 on a site at Rightup Lane, Wymondham</p>	Please see the response to rep. ID 24071 above.	No change to policy 1.

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	Associate Director) [13863]					
Policy 1 The Sustainable Growth Strategy	Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]	24289	Object	<p>The local housing needs assessment conducted using the Standard Method set out in national planning guidance forms only the minimum level of housing need for a local authority and does not establish a housing requirement figure.</p> <p>Using the Government's standard methodology for identifying local housing need, based on the 2014 household projections, the GNLP's housing requirement for the period 2018-2038 is 40,541.</p> <p>The standard method does not account for changing economic circumstances, government policies or other issues that may affect demographic behaviour. In this instance, national planning policy does highlight circumstances whereby additional housing growth above the figure indicated by the standard method may be appropriate, including:</p> <ul style="list-style-type: none"> <li>• "growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</li> <li>• strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or</li> <li>• an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground."</li> </ul> <p>It is vital that the Plan considers economic growth when assessing the local housing need and considers if it is appropriate to set a higher housing requirement than indicated by the standard method to support economic growth ambitions</p> <p>. Further to this, the Greater Norwich City Deal was signed with Government in December 2013 which aimed to create an additional 19,000 jobs and 3,000 homes. In order to support the enhanced growth potential, it is vital that the GNLP plans for a sufficient number of new homes.</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p>	No change to policy 1.

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				<p>Additionally, the Government has highlighted the long-term role the planning system and housebuilding has to play in the economic recovery from the COVID-19 pandemic, locally and nationally . In this way, Gladman encourages the GNDP to fully consider the merits of planning for a housing figure beyond the minimum requirement of 2,027 dwellings per annum. For instance, an increased housing figure would enable the Greater Norwich authorities to capture a larger proportion of the £7 billion yearly housebuilder contributions. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024, it is also imperative that the GNLP identifies sufficient land to support the delivery of homes.</p> <p>In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation’s recommendation that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.</p> <p>Table 6 sets out the GNLP’s total housing potential between 2018 and 2038 which establishes that the GNLP has the potential to provide a buffer of 22% over its housing requirement. Gladman acknowledges and supports the GNLP in its provision of a 22% buffer above the local housing need figure but questions whether the buffer is sufficient after taking into consideration the additional housing needs of Norwich due to the signed City Deal. Any homes which are included in the figures to meet the need of the greater growth aspirations should not be included within the buffer. If the result of removing this additional need from the current 22% buffer resulted in a buffer of below 20%, then further sites should be allocated.</p> <p>74% of the growth expected to come forward over the plan period to 2038 is from completions since the start of the plan period in 2018, permitted sites and existing allocations and commitments from the Site Allocations Plans, Area Action Plans for Wymondham, Long Stratton and the Growth Triangle and Neighbourhood Plans. Gladman acknowledges that a proportion of these sites already benefit from planning permission however raise concern over the deliverability of these sites.</p>		

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				<p>Gladman has specific concerns that the levels of housing proposed will not be delivered on these existing allocations, many of which have been allocated for over five years and have not come forward to date. Gladman questions whether any further analysis or evidence has been provided to understand why these sites have not delivered and to demonstrate clearly that these sites will realistically be delivered within the plan period to 2038.</p> <p>In order to achieve the figure of 31,452 dwellings coming from existing commitments, the GNLP is reliant upon an uplift of the housing density on the existing allocated sites. Gladman questions whether this approach is realistic or feasible. It appears to be an uncertain strategy to assume densities will increase on allocated sites and any uplift needs to be fully supported by evidence that there is a realistic chance that the uplifted quantum of development is achievable on the site. It is important to consider the implications Covid-19 has had on the demand on certain types of properties. A recent Savills Survey found that 39% of under 50s now want a bigger home with greater importance being put on more outdoor space. With this in mind, Gladman questions if it is realistic to assume that an uplift in the density of existing allocations can be achieved and suggests a more appropriate strategy would be to allocate further sites to ensure that a sufficient buffer is available.</p> <p><b>Settlement Hierarchy</b></p> <p>Gladman is supportive of the settlement hierarchy and particularly the identification of Diss and Wymondham as Main Towns. There is a risk to the delivery of the sites identified on the Norwich Urban Fringe due to issues such as market saturation. Gladman also questions whether the uplift to the assumed densities on sites in this location are realistic and achievable.</p> <p>Further growth should be allocated to the Main Towns to ensure the housing need figure is delivered and to allow for greater flexibility. Offering a wider variety of sites to the market in varied locations across the Greater Norwich area will provide greater certainty that the housing requirement will be met.</p>		

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Policy 1 The Sustainable Growth Strategy	Sirius Planning (Miss Francesca Wray, Project Planner) [15640]	24303	Object	<p>The settlement hierarchy includes village clusters which covers all other settlement areas outside the key service centres. The countryside should be identified on the settlement hierarchy enabling the growth of the rural economy.</p> <p>The total amount of allocated and permitted employment land in 2018 is more than enough to provide for expected and promoted growth. Therefore, it is understood that a large number of employment allocations have been brought forward from current adopted plans and that the GNLP does not make significant additional allocations of employment land beyond those already identified.</p> <p>The reassessment of all undeveloped allocated employment sites should be undertaken to determine whether they are likely to be developed by the end of the GNLP period. If a site is no longer considered to be deliverable, it should be de-allocated and replaced by an alternative allocation.</p> <p>The plan could go further with the need for some flexibility to be contained within spatial employment growth to reflect changes in the demand for land in line with paragraph 120 of the NPPF.</p> <p>The GNLP needs to go further in supporting development in the countryside where there is a justified locational need. Paragraph 188 of the Draft GNLP states that the strategy for the location of growth is to maximise brownfield development and regeneration opportunities, which are mainly in Norwich. This should be strengthened to maximise brownfield land within rural areas too. The NPPF encourages the effective use of land by reusing all brownfield land.</p>	The settlement hierarchy includes village clusters which include the open countryside. The plan provides for some employment allocations in accessible locations in and around villages, but generally focuses employment growth higher up the hierarchy in more accessible locations.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Mr Richard Hawker [13393]	24308	Object	<p>There are many aspects of planning which the GNLP has not addressed, or addressed incorrectly.</p> <p>1) The latest plan has taken into account projected housing need figures produced in 2018, whereas it is stated clearly that those from 2014 should have been used.</p> <p>2) The 2018 figures are higher, and do not take into account the already-stated 'windfall' house numbers which inevitably arise.</p>	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth.	No change to policy 1.

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				<p>3) This is made worse by the fact that the later figures do not adequately reflect the fact that Britain has left the EU, and immigration figures are reducing. It simply does not make sense to plan to build houses which are unlikely to be lived in. Even now, there are plenty of permissions for houses which have not been taken up. These surely should be used before looking to increase dramatically the numbers of extra houses planned to be built.</p> <p>4) The development of the area should be about more than simply building dwellings. Norfolk should be preserving its precious countryside, not planning to put it under bricks.</p> <p>5) The numbers in the new proposals are not justified, and thus not consistent with the NPPF. It is doubtful whether the numbers proposed could ever be served adequately by local services as they stand. Also, the plans are not sustainable, in that they will negatively affect the freedom future generations will have to determine the development of the area.</p> <p>6) Following the COVID pandemic, the whole plan should be looked at afresh, bearing in mind changed working practices. Transport, in particular, needs to be assessed now that the rush-hours appear to be less 'peaky' and the government's stated aim of bringing about a modal shift to greener forms, mainly public transport, should mean that new and upgraded big roads are removed from the plan.</p>	If the market for this additional housing does not materialise, they will not be provided.	
Policy 1 The Sustainable Growth Strategy	AAH Planning Consultants (Joe Sullivan) [19998]	24309	Object	<p>Housing Numbers:</p> <p>It is centrally important to consider the Local Housing Need requirement in order for an appropriate and sustainable level of growth to be identified and provided for across the Great Norwich Area, delivering a sufficient amount of housing over the plan period. It is noted that this consultation includes a housing figure of 1,961 dwellings per annum, however, there is no real certainty within this Local Plan consultation in regards to the suitability of these figures. A key government objective is to 'significantly boost' housing supply, and it is felt a greater emphasis should be placed on the wording of the policy so that it is recognised as the minimum housing requirement.</p> <p>Paragraph 60 of the NPPF and the associated guidance within the PPG are clear that the standard method represents the "...minimum number of homes needed..."</p>	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.	No change to policy 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
				<p>The plan must respond to the Governments key objective of boosting the supply of housing. It is important that there is flexibility in the number of housing allocations to ensure that a five-year housing land supply can be maintained over the plan period in order to meet the housing requirement.</p> <p>Therefore, the Council should be seeking to over-allocate housing land to ensure flexibility, choice and competition in the housing market reflecting government guidance.</p> <p>Any Local Plan currently being prepared will also have to consider the effect of the coronavirus pandemic on the housebuilding industry, and subsequently, the deliverability of the Council's current five-year housing land supply. Whilst still relatively unknown, delays in the deliverability of housing are likely, and therefore, a subsequent undersupply may occur.</p> <p>The Council have calculated the Local Housing Need, based upon the Standard Methodology resulting in 1,961 dwellings a year, but this calculation was carried out in June 2018. Further, the LHN, when calculated using the Standard Methodology, can fluctuate year to year based upon the housing projections, and the Standard Methodology doesn't take account of economic growth. We therefore, recommend a Housing Requirement between the aggregated Local Housing Need for the three authorities calculated by the Standard Methodology and a requirement that takes account of the economic growth that the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land.</p> <p>Just as the Local Housing Need can fluctuate, so can the buffer that is required in the context of 5-year housing land supply. The District Council may decide to confirm their 5-year housing land supply, in which case a 10% buffer would apply, and the rate of deliverable may also fall over the plan period, in which case a 20% would apply. We consider that a 20% buffer would ensure that the plan is future-proofed and provide flexibility, choice and competition in the housing market, reflecting government guidance.</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>We consider that the Council should be targeting a higher housing requirement than the Local Housing Need calculated using the Standard Methodology. It is notable that the proposed requirement does not provide an uplift for economic growth, even though the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land. We support the Local Plans ambition with respect to economic growth and believe that a housing requirement uplift is necessary to support this.</p> <p>In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). The Plan must be aspirational but deliverable to be positively prepared (NPPF, paragraph 16), and the target of new homes per annum is insufficient to realise job-led housing need across the plan area. In order to be found sound, the Local Plan should be targeting higher growth within the Local Plan in accordance with the above explanation.</p>		
Policy 1 The Sustainable Growth Strategy	Strutt & Parker (Adam Davies, Associate Director) [17169]	24312	Object	<p>Rep. submitted in relation to the site "Land between Shelfanger Road and Mount Street, Diss GNLP0341"</p> <p>The Plan does not contain sufficient provision of housing for older people, despite an identified need for 3,857 specialist retirement units, (which includes sheltered, age-restricted or extra care housing).</p> <p>The Site would make a modest but much-needed contribution of 24 single-storey properties for those aged 55 and over, as well as those with, or supporting someone with a disability, the need for which is not currently being met within Diss.</p> <p>In addition, the Site would safeguard land for the future expansion of the Medical Centre, as well as open up a currently inaccessible area for public enjoyment. Circa 45% of the Site is proposed as public open space. With additional habitat creation and the protection and enhancement of the trees would provide the opportunity to achieve a biodiversity net</p>	The plan provides both allocations to meet the needed of older people and a criteria-based policy (5 for Homes) to allow such housing to be brought forward in a variety of locations.	No change to policy 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
				<p>gain.</p> <p>It is not considered appropriate nor consistent with national policy for the Plan to devolve the responsibility to meet the majority of the strategic housing requirement for Diss to the Neighbourhood Plan process. Nor does such an approach confer any responsibility or certainty that the needs of older people will be met.</p> <p>We therefore consider the Pre-Submission Draft Plan to be unsound in respect of the lack of provision for older persons' accommodation, particularly in Diss, as well as the current approach that seeks to place the responsibility for meeting the majority of the identified housing target on the Neighbourhood Plan. As such, it cannot be considered positively prepared, justified, effective or consistent with national policy.</p>		
Policy 1 The Sustainable Growth Strategy	Mr Graham Martin [19999]	24320	Object	<p>Residents in towns and villages in the Greater Norwich Area and throughout Norfolk regularly learn of new housing developments planned in their area. Who are these houses for? Certainly not for our local young people trying to own their own home as the so-called affordable homes in the development cost much more than most young people can afford. Developers frequently attempt to reduce the already low numbers of these "affordable homes " still further, arguing if they do not the scheme would not be profitable for the developer!!!!</p> <p>It is puzzling why developers are still making applications for more development and getting approval by planners when there are some 31,452 un-built commitments in the GNDP area. -</p> <p>Throughout Norfolk the 5-year bank requirement has been achieved so why are some planners still approving new developer applications?</p> <p>Properties in Norfolk are cheaper because many developments are being built on greenfield sites where land is cheaper.</p>	The plan is intended to provide the strategic framework and the sites to enable housing growth to be directed into the most suitable locations to meet needs. It includes a requirement for affordable housing (policy 5 Homes) to meet needs. It also carries forward existing deliverable housing sites. It also provides brownfield sites to meet needs, maximising their potential.	No change to policy 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
				<p>Some developments like the Research Park and the Hospital are necessary but do we need more out of town retail parks and houses on greenfield sites?</p> <p>It is important to retain agricultural land. Unneeded and unwanted development is spreading like a cancer in the Greater Norwich. Planners seem to be allow developers to "cherrypick" areas for new developments on greenfield sites</p>		
Policy 1 The Sustainable Growth Strategy	Iceni Projects Ltd (Mr James Waterhouse) [20001]	24353	Object	<p><b>Housing requirement</b></p> <p>Broadly support the overall quantum of development being planned, including the reasonable buffer.</p> <p>Policy 1 should include explicit reference to the housing requirement, both for the 20 -year Plan period as a whole and on an annualised basis.</p> <p><b>Growth strategy</b></p> <p>Support the intention to focus growth in the most sustainable locations, and particularly in the Norwich urban area. The redevelopment of the former Carrow Works site has the potential to deliver some 2,000 new homes towards the identified housing need for Greater Norwich, as well as employment space accommodating approximately 1,500 jobs, in a sustainable location to the southeast of the City Centre.</p>	Support for the buffer and East Norwich noted. It is considered that policy 1 adequately sets out how the plan provides for the area's growth needs.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Mrs Nicole Wright [14312]	24402	Object	An up-to-date evidence base in relation to the current and proposed open space and play space provision is required to inform the Strategy and proposed allocations.	Open space issues are addressed in existing adopted DM policies and have not been revisited in this strategic plan.	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Mr Andrew Cawdron [12806]	24413	Object	The GNLP should not increase the total number of dwellings beyond the necessary minimum and should not include the increase made between Regulation 18 consultations and this consultation. Is this change legal or fair? The effective contingencies include both the excess 22% buffer and windfall sites, which demonstrate that an increase to the 'minimum' is not required. Further, the Office for National Statistics in their Household Projection assessments 2018 project that 95% of household increase in the period will be 1 person or 2 person no dependant households. Suburban housing estates are the wrong solution.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.	No change to policy 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
Policy 1 The Sustainable Growth Strategy	David Lock Associates (Heather Pugh, Partner) [20014]	24454	Object	<p>Whilst we support the thrust of Policy 1 and its supporting text, we consider that the amendments to Policy 1 proposed in the Reg 19 plan fail to address a number of key issues:</p> <p>(a) Ensuring housing need is fully aligned with economic growth ambitions;</p> <p>(b) Properly embedding the commitment expressed in Policy 7.6 to a new settlement for accommodating higher housing needs arising within the current plan period (this should specifically be referenced under the Housing text of Policy 1); and</p> <p>(c) Failing to provide sufficient certainty and clarity by identifying within Policy 1 and the Key Diagram a preferred spatial growth area within which any new settlement could come forward.</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>Policy 7.6 sets out the approach to new settlements. Identifying their potential for the next plan period.</p>	No change to policy 1.
Policy 1 The Sustainable Growth Strategy	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24471	Object	<p>The current wording of the policy needs to be strengthened with regard to the delivery of green infrastructure (GI). Currently it is rather vague and weak with regard to the essential role that quality GI must play if sustainable development is to be delivered under the Plan and meet the needs and aims as set out in the accompanying text under (161).</p> <p>The policy needs to cross reference Policy 3 in order to provide a strong and clear steer of what will be required to deliver the growth strategy, whilst protecting and enhancing the area's natural environmental assets, and to make the Plan sound. It refers to other relevant Plan policies in relation to housing, the economy, areas of growth and other strategic infrastructure, so links to Policy 3 should be included too.</p>	<p>Although it is not considered necessary for soundness purposes, it is agreed that a cross reference to policies 2, 3 and 4 in the final sentence of the policy would provide greater clarity.</p>	<p>Make a minor modification to add a cross reference in policy 1 in relation to green infrastructure provision in the final sentence of the policy so that it reads:</p> <p>The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services <b>as set out in policies 2, 3 and 4.</b></p>
Policy 1 The Sustainable Growth Strategy	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24503	Object	<p>The GNLP is unsound. The number of new dwellings and deviation from the Government's standard methodology using 2014-based projections is not justified and additional homes would increase carbon emissions.</p> <p>The total provision of new dwellings has been raised from 40,541 to 49,500 with an unjustifiable increase in the buffer from 5%, as required by the NPPF, to 22%, a figure that the GNDP describes as 'significant' and has not been subject to public consultation. In addition, to this allocation, a minimum of 1,200 new homes will be provided in South Norfolk Village Clusters Housing Site Allocations document and 250 will be provided through allocations in the Diss and area Neighbourhood Plan, which are outside the purview of this consultation.</p>	<p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided. The plan also includes a contingency site at Costessey which with a trigger mechanism in the site allocation to allow it to come forward if there is a need.</p>	No change to Policy 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
				<p>The experience of a high housing target in the Joint Core Strategy has been the difficulty of meeting a five-year housing land supply leading to developers winning planning appeals to build on greenfield sites unallocated in the JCS. Local councils are keen to grant planning permission for new homes, but the rate of delivery is in the hands of developers. Before the recent spurt in local housing delivery, Greater Norwich was below the five-year housing land target. This was not due to any unwillingness on the part of the councils to grant planning permission, but to the slow rate of housing completions. Buildings rates have increased in the past three years leading to a current housing land supply for Norwich (March 2021) of just over 6 years which does not suggest a shortage of sites.</p> <p>The GNP local planning authorities are keen on high housing targets for several reasons. Firstly, to deliver affordable homes, although ironically the Councils have experienced repeated problems of developers challenging housing viability which led for several years to considerable under-delivery of affordable dwellings. We have seen an improvement in the number of affordable homes being built in Norwich in the last three years, but this has been largely achieved by the City Council building council homes. Secondly, housing growth at a strategic scale attracts central government investment.</p> <p>These above reasons do not justify inflating the housing figures because the downside is that the external environmental impacts such as carbon emissions and traffic growth are borne by society. Over 70% of the locations identified for the quantum of proposed housing are greenfield land which will increase journey distances and reliance on the private car.</p> <p>The SEA of the GNLP calculates that the proposed development of 49,492 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area by 27.1% (565,079 tonnes based on 2018 estimates), for example due to allocating housing on a total of 84 sites located on previously developed land (1,091ha) . (Residual Effects from the GNLP). In response, the GNDP says that the increase in the number of residents is over-stated as a large proportion of need for new homes arises from the existing</p>	<p>The strategy seeks to maximise the use of brownfield sites. Although it is accepted that there is a possibility of windfall arising from likely economic changes which the strategy will enable to come forward, the amount of additional sites this will provide is unlikely to make a significant contribution to providing sites to address housing needs.</p> <p>Whilst focussing the great majority of growth in the urban area and our towns and larger villages, the strategy allows for a suitable level of growth in villages to support service retention in those villages.</p> <p>The scale of housing need in the area is so high that phasing is not a practical approach as it would reduce flexibility in relation to the delivery of housing.</p> <p>The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</p> <p>The overall housing numbers in the plan and the numbers identified for the village clusters are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19 recovery and the move to a post-carbon economy, as well as supporting the retention of services in villages. This approach to allowing for some growth in village clusters is in line with former strategic approaches. The proportion of growth in village clusters is lower than the current proportion of the population living in those clusters.</p> <p>The three Regulation 18 consultations, including a draft plan with reasonable alternatives for housing sites and numbers, followed by the Regulation 19 publication stage, constitute effective consultation.</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>population and that the strategy for future development is to focus growth in the more sustainable locations.</p> <p>The GNP underestimates the impact of new housing on greenfield land. These include the loss of agricultural land; the increase in buildings and hard paving, contributing to temperature rise, and the additional resources used by the population living in smaller households and occupying more housing such as car ownership, water usage and waste creation, the latter which is increasingly being sent for carbon intensive energy from waste incineration.</p> <p>The GNDP argument that new homes will be located in more sustainable locations with the potential for non-vehicle modes of travel. However, this argument does not bear out the reality in Norfolk where even in large market towns such as Wymondham where a majority of even short journeys take place in the car. Norfolk County Council's depiction of the County as a rural place which will remain reliant on the private car allows the Council to continue to argue for road improvements. The GNDP is trying to face both ways in claiming that housing in rural areas is sustainably acceptable and then arguing for improvements of the road network to support rural dwellers.</p> <p>It is for this reason that the Green Group is opposed to Village Clusters amounting to the rural dispersal of housing to places with no or few services. South Norfolk Council's argument has been that electric vehicles will be the panacea. However, this is not the case that electric vehicles will save the transport sector from having to addressing its mega carbon impact and allow business-as-usual- to continue. Dispersal of development adds to journey distances and to environmental impacts such as congestion close to urban areas, leading to demands for road building which together with embodies carbon in vehicle manufacture, involves considerable carbon in constructing new roads.</p> <p>Weight should be given to draft consultation NPPF (Jan 2021) and the replacement policy on sustainable development for clause 11a): 'Plans and decisions should apply a presumption in favour of sustainable development.'</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>11a) 'Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects'.</p> <p>We support the concentration of development in and around the Norwich urban area. However, we disagree with the allocation of a contingency site at Costessey for around 800 homes in relation to our argument about the excessive number of dwellings overall. It would be more sustainable to consider East Norwich which is within easy walking distance of the city centre, bus and railway stations.</p>		
Policy 1 The Sustainable Growth Strategy	Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	24509	Object	<p>We wish to reiterate reps made at Reg18C (33 rep IDs listed). 21244, 21246, 21253, 21258, 21261, 21263, 21265, 21266, 21267, 21269, 21272, 21277, 21283, 21287, 21288, 21298, 21301, 21304, 21312, 21314, 21318, 21320, 21322, 21325, 21331, 21332, 21333, 21335, 21336, 21339, 21352, 21355, 21358.</p>	The reps referred to made at the Reg.18C stage cover the breadth of the plan. Some aspects of text and policies have been revised to address areas of concern. Policies on affordable housing, environment etc are considered sound. Many of the reps refer to the broad distribution of growth; we consider the strategy makes best use of brownfield sites and urban extensions. Growth is directed proportionate to settlement size and availability of services. Additionally, policies 7.4 and 7.5 address social sustainability and policy 7.6 looks ahead to the potential of a new settlement in the next plan.	No change to the plan
Policy 1 The Sustainable Growth Strategy	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24518	Object	<p>This representation is in support of allocation of land at Hethersett.</p> <p>The main issues raised in relation to procedural issues and policy 1 are the same as set out above in rep ID 24071 on a site at Rightup Lane, Wymondham</p>	Please see the response to rep. ID 24071 above.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Hopkins Homes Limited (Mr Chris Smith, Development Planner) [14202]	24522	Object	<p>The list of defined 'Key Service Centres' proposed within the Table under 'Housing' should be amended to add the settlements of Mulbarton and Scole.</p> <p>Sufficient levels of growth should be allocated to each of the defined 'Key Service Centres' to enable them to respectively fulfil their roles to provide for sufficient housing and economic growth over the Plan period.</p>	No changes are considered necessary to the settlement hierarchy or to the amount of growth in Mulbarton and Scole.	No change to policy 1
Policy 1 The Sustainable Growth Strategy	Coltishall Parish Council (Mrs Rebecca Furr,	24541	Object	<p>Much of the harm identified by the Sustainability Appraisal and Strategic Environmental Assessment is due to the use of greenfield sites. Large scale greenfield development in Greater Norwich is inherently</p>	The strategy seeks to maximise the use of brownfield sites. Although it is accepted that there is a possibility of windfall arising from likely economic changes which the strategy will enable to come	No change to policy 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
	Parish Clerk) [14396]			unsustainable and runs contrary to the guidance in NPPF para 107. 78% of housing (38,600 houses) is on greenfield sites. In addition, over 300ha is allocated to commercial use. 1019 ha in total of previously undeveloped land will be used. The plan allocates 4,220 houses to 'village clusters' and 6,800 to surrounding towns, plus windfall housing, and this is likely to be particularly harmful. Such development is contrary to good planning policy and is unnecessary. Large amounts of office and retail space in the city centre are likely to be redundant following the pandemic and to become available for redevelopment.	forward, the amount of additional sites this will provide is unlikely to make a significant contribution to providing sites to address housing needs.	

**Policy 2 – Sustainable Communities**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Intro 198	Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	23810	Support	Development at Rackheath should support its character and rural area, with no 3 storey houses	Support noted. Planning applications will consider the relevant Development Plan policies and any other material considerations. Potential impacts on local character will be a consideration.	No change
Intro Table 8	National Grid (Matt Verlander, LP Contact) [13219]	23911	Support	No comments on the consultation. Guidance on development near National Grid assets provided.	Noted.	No change
Intro Table 8	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24226	Object	<p>Not sound Does not comply with the Duty to Co-operate.</p> <p>Will policies on water efficiency be sufficient to cope with the cumulative growth of both GNLP and Breckland? What modelling has been done to look at cumulative growth impacts?</p> <p>Will energy efficiency requirements be sufficient to deal with energy capacity problems when border district growth is taken into account? The Greater Norwich Energy Infrastructure Study May 2019 did not consider neighbouring Breckland District power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham within the scope of its study</p>	<p>A Water Cycle Study has been undertaken and concludes that growth can be accommodated taking account of future improvements by Anglian Water Services. Information on future planned growth was requested from Breckland DC and taken into account in the modelling for the WCS.</p> <p>For energy infrastructure see comments on Policy 4 Infrastructure.</p>	No change
Intro Table 8 Issue 3	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24473	Object	<p>Not Sound</p> <p>It is appropriate for developments to be required to deliver GI off-site, or to financially contribute to this, where it is not possible to deliver quality GI which meets the needs of residents. GI provision is essential to divert and deflect the daily recreational visits away from the sensitive Habitats Sites, and rare species, to avoid adverse effects.</p> <p>It would be useful to state in (3) that development is expected to avoid loss or severance of existing GI networks, and to contribute to the enhancement and extension of existing GI on-site in order to strengthen these networks. (wording suggested)</p> <p>It is unclear if the above Green Infrastructure Strategy in (3) refers to The Greater Norwich Green Infrastructure</p>	<p>Table 8 is a list of key issues relating to policy 2 and the achievement of sustainable communities. Green infrastructure is one element of this.</p> <p>The text is adequate and the GN authorities do not accept that the Plan is unsound in this respect. However, as Natural England has questioned the clarity of the text the authorities are willing for an amendment to be made to clarify the explanatory text re GI provision, reflecting the wording suggested by Natural England. The authorities propose that this be done by them as a minor “additional” modification.</p> <p>The GI Strategy referred to is the current one (2007) though the reference would be applicable to future reviews of the strategy.</p>	<p>Amend explanatory text under Table 8 Issue 3 as a minor modification, adding:..</p> <p>“Where it is not possible to deliver sufficient quality green infrastructure on-site it will need to be provided off-site nearby, either directly by the developer or through a financial contribution to deliver it”; and “The aim is to provide an overall strengthening of green infrastructure</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
				Strategy (dated November 2007) or the Greater Norwich Green Infrastructure Study (produced in December 2020).		networks, which will entail avoiding loss or severance and the enhancement of existing green infrastructure networks, as well as creating new elements”.
Policy 2	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23350	Support	Not a soundness issue.  A reference (e.g. in a footnote) to the Broads Landscape Character Assessment would be welcomed.	For development proposals close to the GN area boundaries landscape character assessments outside the area may be relevant as well as those within it. However, the policy refers to landscape character assessments, and makes specific reference to the Broads, it does not limit these to just Greater Norwich authority ones nor are these specifically referenced. As such it is not necessary nor appropriate to list all that might be relevant, and, of course, these may change over time.	No change.
Policy 2 (iii)	RJ Baker & Sons [19063]	23487	Object	Not sound  Greater clarity is required for the definition of 'delivery plans' reflecting the varied nature of parties that promote planning applications.	Delivery plans or statements are explained in the section on implementation of the policy. They only apply to developments of 100+ dwellings which in practice would usually mean that a developer was involved. Nevertheless, if this was not the case it would still be for the applicant (whether individual or body) to set out their delivery expectations. This might be with less precision than would be the case for an actual developer, but it should be feasible to give dates for marketing the site, expected sale to a developer, allowance for detailed planning application, typical build rates etc. .	No change
Policy 2	Mrs Janet Skidmore [19326]	23502	Support	The principles are of Policy 2 are supported.	Support noted	No change
Policy 2	Noble Foods Ltd [19330]	23524	Support	The principles are of Policy 2 are supported	Support noted	No change
Policy 2	Taylor Wimpey [19920]	23625	Support	The principles are of Policy 2 are supported	Support noted	No change
Policy 2	Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]	23673	Object	Not sound  The NPPF requires Plans to be clear and unambiguous.  Third bullet point of part 9 refers to possibility of setting a higher local standard. If the Govt provides for a higher optional standard the policy should be reviewed. If a higher standard is required through building regulations, then this will be mandatory and the statement is	Policy 2 states: “If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich”. This is clear and unambiguous. Due to a limited water resource, relatively low rainfall and the potential for impacts on internationally important wildlife sites from low water flows / abstraction, it is imperative that water efficiency is a priority. If Govt policy specifies higher local standards as being allowable then	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>redundant. We would therefore suggest the phrase is deleted.</p> <p>Part 2 mentions that development proposals will need to make provision for electric vehicles. However, the local plan does not state the level of provision that is considered acceptable but will instead rely on supplementary guidance to set out the detail of any expectations. Firstly, it is not appropriate to set out the requirements of such a policy in a supplementary planning document. The detail as to how many electric vehicle charging points should be provided are development management policies which should be in a local plan.</p> <p>Secondly, the provision of electric vehicle charging points has not been considered in the Viability Appraisal (costs can be very high if power supply improvements are needed).</p>	<p>these should be applied, and it is advantageous to set this out in the Plan now so that they can apply rather than waiting the considerable time for a review to be undertaken.</p> <p>Policy 2 states: “development proposals are required, as appropriate, to: 2. Make provision for delivery of new and changing technologies (including broadband, fibre optic networks, telecommunications, construction methods and electric vehicles); ... As a strategic policy this does not set out full detail but makes it clear that it should be “appropriate” to that development. If further policy detail is deemed necessary this would need to be set out in a future Local Plan e.g. a review of the Development Management Policies Local Plan. Any Supplementary Planning Documents on the issue would be as guidance and not set policy.</p> <p>An allowance has been made in the Viability Assessment for such costs. If costs were so unusually high as to affect the viability of a development this would be taken into account in considering that application and what was “appropriate”.</p>	
Policy 2	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23782	Support	Comments made on Green Infrastructure	Support noted Comments noted	No change
Policy 2	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23802	Object	<p>Not sound</p> <p>AW is generally supportive of the requirements relating to water efficiency (including the optional water efficiency standard) and flood risk management and protection of water quality but would ask that reference be made to water re-use measures, the use of SuDs as part of all development proposals together with receiving water recycling centres (wording changes suggested).</p>	The GNLP is a strategic plan, and Policy 3 is written accordingly. In accordance with the NPPF Local Plans should be concise and avoid excessive detail. It is not necessary for Policy 2 to go into the level of detail that might be appropriate for other local plans such as Development Management Policies Local Plans. Such other plans will also apply and the GNLP does not need to replicate these.	No change
Policy 2	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning)	23930	Object	<p>Not sound</p> <p>The inclusion within criteria 1, 6 and 7 of the importance of creating safe, inclusive, resilient communities is welcomed.</p>	The policy sets out the key elements for creating sustainable communities including “Create inclusive, resilient and safe communities” and this would apply to development proposals. Planning applications would be considered based on 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
	Consultancy) [14146]			Within the policy however, specific reference should be made to require developers of major developments (of 500+ dwellings) to detail the measures that will be taken to deliver safe, resilient and inclusive communities including how they will fund the necessary infra-structure. Therefore, criteria (i) of this policy should include reference to the specific objective to create and maintain a safer community and reduce crime and disorder.	proposals in the scheme and infrastructure requirements would be met through CIL or legal agreements or conditions on a permission as appropriate. It is not necessary nor appropriate to have a specific requirement and reference in the policy as suggested by the objector.	
Table 8 Issue 7	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]	23931	Support	Norfolk Constabulary support Issue 7 for the establishment and maintenance of resilient, safe and inclusive communities and also Issue to provide convenient, safe and sustainable access to facilities. Further provisions that reference Secure by Design etc would be welcomed.	Support noted  Comments noted	No change
Policy 2	Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	23940	Object	Not sound  There should be a coherent climate adaptation policy and more detailed policies on climate change and adaptation, setting out the measures that developers should do.	The Plan sets out relevant and appropriate policies for development and, together with the strategy for location of development, these address the aims of tackling climate change. However, the Plan only relates to development issues and is not intended to be a generic wider strategy for climate change.	No change
Policy 2	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23960	Object	Not sound  Policy 2 would be further improved with specific reference to conservation area appraisals in criterion 5 to read  ...taking account of landscape or historic character assessments including conservation area appraisals, design guides and codes.	The GNLP is a strategic plan and is written accordingly. Also, in accordance with the NPPF Plans should be concise and not go into an excessive level of detail. As such the GNLP does not go into a high level of detail that might be appropriate for other local plans such as Development Management Policies Local Plans. Such other plans will also apply and the GNLP does not need to replicate these. Currently the policy states: " ... taking account of landscape or historic character assessments, design guides and codes". It is not necessary to include a complete list of all the variety of documents that might be relevant; however, conservation area appraisals are particularly relevant and so it is accepted that inclusion of "including conservation area appraisals" after "historic character assessments" might be beneficial as a minor modification to the plan for factual clarification.	Insert: "including conservation area appraisals" after "historic character assessments" as a minor modification to the plan for factual clarification.
Policy 2	Bidwells (Mr Iain Hill, Partner) [16273]	24082	Object	Not sound  The efficient use of land through an indicative minimum density is supported, however, as well as on site characteristics consideration should be given to a range of other site / scheme specific issues, e.g. housing mix	The phrase "site characteristics is meant in a wide sense, not just about the physical nature of a site, and would include the specifics of a proposal. And the policy is clear that the densities indicated are "indicative". As such the policy is flexible and appropriate as worded.	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
				and design considerations. As drafted, the policy is not flexible to changing circumstances and needs.		
Policy 2	Bidwells (Mr Iain Hill, Partner) [16273]	24092	Support	The preparation of a Sustainability statement and Delivery Statement by major development is supported.	Support noted  Comments noted	No change
Policy 2	Kevin Goodwin [19980]	24152	Object	Not legally compliant  Not sound  The issues should not be treated in isolation but should be cross referenced and treated as interlinked	It is accepted that the issues of sustainable communities are interlinked, and this is part of the reasoning for bringing them together in one policy. Nevertheless, other policies in the plan should not be discounted and these all apply where and as relevant to a proposed development.	No change
Policy 2	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24156	Object	Not sound  There is no requirement in the NPPF for proposals to protect and enhance landscape or local character. Revised wording suggested: "5. Recognise the intrinsic character and beauty of the character, be sympathetic to local character and protect and enhance valued landscapes, ..."  Re possible future optional water efficiency standard - There is no justification for applying an unknown potential future government requirement. If an optional standard was introduced by the Government it should not be applied without assessing the impacts such as on viability. Therefore, it would need to be introduced through a Local Plan review.	Chapter 15 of the NPPF is about "Conserving and enhancing the natural environment" and Chapter 16 about "Conserving and enhancing the historic environment". Landscape and local character are elements of these environments and therefore appropriate for protection and enhancement. The NPPF (para 170) requires planning policies to "contribute to and enhance the natural and local environment" and lists means of doing this, but this is not restrictive, other means may also contribute to the aims. In addition, para 170 refers to "protecting and enhancing valued landscapes" criteria (a); and "recognising the intrinsic character and beauty of the countryside" (criteria (b)) that would include its landscapes; as means for contributing to and enhancing the environment. Similarly, para 185 (c) refers to the "desirability of new development making a positive contribution to local character and distinctiveness". Therefore, the policy is worded appropriately and fully in accordance with the NPPF.  Re water efficiency, Policy 2 states: "If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich". This is clear and unambiguous. Due to a limited water resource, relatively low rainfall and the potential for impacts on internationally important wildlife sites from low water flows / abstraction, it is imperative that water efficiency is a priority. If Govt policy specifies higher local standards as being allowable then these should be applied, and it is advantageous to set this out in the Plan now so that they can apply rather than	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
					waiting the considerable time for a review to be undertaken. If costs were so unusually high as to affect the viability of a development this would be taken into account in considering that application and what was appropriate to be applied.	
Policy 2	Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	24178	Object	<p>Not sound</p> <p>A requirement for electric vehicle charging points should not be set out in SPD. It can have a direct impact on viability and it has not been taken into account in the viability assessment. Other elements of the policy have also not been taken into account in viability (reduction on Part L of building Regs and self-build requirement).</p> <p>Criterion ii masterplanning process is not described and may delay delivery of development. This has not been acknowledged in the housing trajectory.</p>	<p>Policy 2 states: “development proposals are required, as appropriate, to: 2. Make provision for delivery of new and changing technologies (including broadband, fibre optic networks, telecommunications, construction methods and electric vehicles); ... As a strategic policy this does not set out full detail but makes it clear that it should be “appropriate” to that development. If further policy detail is deemed necessary this would need to be set out in a future Local Plan e.g. a review of the Development Management Policies Local Plan. Any Supplementary Planning Documents on the issue would be as guidance and not set policy.</p> <p>An allowance has been made in the Viability Assessment for such costs. If costs were so unusually high as to affect the viability of a development this would be taken into account in considering that application and what was “appropriate”.</p> <p>Masterplanning is an inherent part of proper planning for and designing large developments; it should not significantly add to the time taken for developments to be delivered, and should shorten the time taken by easing the planning application process.</p>	No change
Policy 2	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24194	Object	<p>Not sound</p> <p>The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence upon which Policy 2 relies, nor is the reduction to 19% explained.</p>	<p>The Government’s objectives for the planning system to achieve sustainable development includes “using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”. Reducing energy use is a key part of this and so it is appropriate to include a requirement for this in policy. A 19% reduction has been identified as an appropriate figure, having regard to the Building Regulations, the Greater Norwich Energy Study, nationally published reports; what has been adopted in approved local</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
					plans across the country; viability issues, and comments received on the Plan both for and against a requirement..	
Policy 2	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24225	Object	Not Sound  Does not meet Duty to Co-operate  Concerns over the scale of growth proposed in the Norwich to Cambridge Corridor, particularly at Honingham Thorpe, Hethel and Silfield, in terms of electricity and water supply and disposal.	See Strategic Policy and Infrastructure sections.	No change
Policy 2	Climate Friendly Policy and Planning (CFPP) (Dr Andrew Boswell, Consultant) [12486]	24246	Object	Not legally compliant  Not sound  The approach to climate change is fragmented, a specific policy is needed. The GNLP is not effective without it.	The Plan sets out relevant and appropriate policies for development and, together with the strategy for location of development, together these address the aims of tackling climate change. However, the Plan only relates to development issues and is not intended to be a generic wider strategy for climate change.	No change
Policy 2	Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]	24290	Object	Not sound  Support the principle of developments making effective use of land and that densities should be dependent upon on-site characteristics with higher densities in the most sustainable locations. But higher densities applied to the proposed allocations should be applied with caution unless specific evidence has been provided from the developer, landowner or promoter to support delivery. If the higher densities are not achieved there is a risk to the delivery of the strategy.	Comments noted  It is believed that the densities applied to the allocations are achievable. There may be circumstances that arise for specific cases that mean lower densities are achieved, but this should not be the norm and the "buffer" that is included in the housing figures should be more than sufficient to deal with any shortfalls.	No change.
Policy 2	Iceni Projects Ltd (Mr James Waterhouse) [20001]	24354	Object	Not sound  Point 9 of the Policy is not sufficiently clear in terms of applying possible future higher optional standards for water efficiency. This does not provide sufficient certainty for assessing proposals as required by NPPF para 16(d) as it is currently unknown what future standards might be.  This also causes uncertainty of the deliverability of development as future standards cannot be factored into the viability assessment. It cannot be known whether the requirement to meet any future standards would be viable or place an undue burden on developers and thus poses a risk to the delivery of development.  A future standard should be dealt with by a review of the Plan.	The Policy is appropriately worded and is clear.  Policy 2 states: "If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich". This is clear and unambiguous. Due to a limited water resource, relatively low rainfall and the potential for impacts on internationally important wildlife sites from low water flows / abstraction, it is imperative that water efficiency is a priority. If Govt policy specifies higher local standards as being allowable then these should be applied, and it is advantageous to set this out in the Plan now so that they can apply rather than waiting the considerable time for a review to be undertaken. If costs were so unusually high as to affect the viability of a development 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
					would be taken into account in considering that application and what was appropriate to be applied.	
Policy 2	Savills (Lydia Voyias, Associate) [16956]	24385	Object	Not sound  Requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by evidence and has viability implications for development.	The Government's objectives for the planning system to achieve sustainable development includes "using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy". Reducing energy use is a key part of this and so it is appropriate to include a requirement for this in policy. A 19% reduction has been identified as an appropriate figure, having regard to the Building Regulations, the Greater Norwich Energy Study, nationally published reports; what has been adopted in approved local plans across the country; viability issues, and comments received on the Plan both for and against a requirement..	No change
Policy 2	Mrs Nicole Wright [14312]	24386	Support	Sound	Support noted	No change
Policy 2	Mrs Nicole Wright [14312]	24403	Object	Not sound  More allocations should be made to achieve the requirements of Policy 2	Sufficient allocations have been made to meet the identified needs for development.	No change
Policy 2	ClientEarth (Mr Sam Hunter Jones, Lawyer) [19067]	24407	Object	Not legally compliant  Not sound  Regard should be had to the UK Climate Change Committee (CCC) 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; and the Norfolk Strategic Planning Member Forum (NSPMF) research paper on 'climate change and the planning system'. Emissions reduction requirement could be higher, costs used in viability assessment are wrong. Achieving Zero carbon should be the starting point and requirements worked back from that e.g. for viability considerations.  The plan fails to scope and designate areas suitable for wind energy, and misinterprets NPPF policy on this.	The GNLP conforms to legislation and national planning policy and guidance, and, subject to the above, has had regard to climate change issues. Policy 2, and others in the Plan, seek to address such issues.  The proposed emissions reduction is at an appropriate level. Viability is a consideration and has been taken into account.  The policy states: "Wind energy schemes will be supported where the proposal is in a suitable area as identified in a neighbourhood plan or other local plan documents or has been demonstrated to have the support of the local community", and is in accordance with the NPPF.	No change
Policy 2	Mr Andrew Cawdron [12806]	24414	Object	Not legally compliant Not sound	The policy sets out the key elements for creating sustainable communities and applies to all development proposals.	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 increased numbers or their location are not sustainable. There are better opportunities in Norwich for dwellings and reduced reliance should be placed upon new greenfield sites adjoining Towns, Key Service Centres and Village Clusters, all of which tend to become 'dormitory' estates demanding vehicular access for employment, schools or medical facilities and therefore carbon positive.		
Policy 2	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24472	Object	Not sound  It is unclear what are the 'relevant green infrastructure strategies and delivery plans' and the policy should also cross reference Policy 3. Rewording to point 3 suggested.	What is relevant will need to be determined at the time of a proposal as strategies and delivery plans will evolve. All policies of the Plan apply where relevant to a proposal; it is not necessary for there to be cross-references within policies.	No change.
Policy 2	Savills (Lydia Voyias, Associate) [16956]	24513	Object	Not sound  Requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by evidence and has viability implications for development.	The Government's objectives for the planning system to achieve sustainable development includes "using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy". Reducing energy use is a key part of this and so it is appropriate to include a requirement for this in policy. A 19% reduction has been identified as an appropriate figure, having regard to the Building Regulations, the Greater Norwich Energy Study, nationally published reports; what has been adopted in approved local plans across the country; viability issues, and comments received on the Plan both for and against a requirement..	No change
Policy 2	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24519	Object	Not sound  The policy seeks to ensure that landscape and heritage assets are protected which is to be supported. Table 8 and criterion 5 identify that this will be achieved in part through strategic gap policies in the absence of a Green Belt. This is not the role of the strategic gap or that of the Green Belt as they are not landscape or heritage policies. They are place-shaping policies (GNLP para 370 intended to prevent the coalescence of settlements, not protecting the landscape or heritage assets. The reference to the strategic gap is not effective in meeting the objective of this criterion and should be deleted.	A "gap" between developed areas is also itself an area of landscape and may well contain heritage assets including historic landscape. Therefore, the reference in Table 8 is appropriate.	No change
Policy 2	David Lock Associates (Heather Pugh, Partner) [20014]	24552	Support	Some duplication of national policy within the supporting text which could simply be cross-referenced. Welcome the approach to identifying area-specific requirements e.g. energy networks.	Support noted  Comments noted.	No change

**Policy 3 – Environmental Protection and Enhancement**

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 202	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23961	Object	Not sound  The NPPF requires Plans to include a positive strategy for the historic environment (para 185). Include more here about the distinctive, unique heritage of the area – what makes this special and different from elsewhere?	In addition to general references in the supporting text to Policy 3, Section 2 the Greater Norwich Profile highlights key information about the area, including about heritage assets. This is adequate for the purposes of the Local Plan and accords with NPPF para 15 that requires plans to be succinct. More detailed information on the area is available in a range of documents, such as conservation area appraisals, landscape character assessments etc. The “strategy” for the historic environment is achieved through Section 3 the Vision and Objectives e.g. para 147, the Plan’s Objectives under “environment”, Policy 2 Sustainable Communities, Policy 3 Environmental Protection and Enhancement, policies in separate Development Management Local Plans, and supporting documents such as Conservation Area appraisals. Hence, there is a positive strategy for the historic environment.	No change
Para 203	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23962	Object	Not sound  The NPPF requires Plans to include a positive strategy for the historic environment (para 185). Include more here about the distinctive, unique heritage of the area – what makes this special and different from elsewhere?	See response to rep 23961	No change
Para 203	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23963	Object	Not sound  Replace historic assets with heritage assets in line with the terminology used in the NPPF.	It is appropriate to reflect the NPPF terminology as requested	Change text to state “heritage assets” instead of “historic assets” in para 203 as a minor modification
Para 204	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23966	Object	Not sound  Welcome reference to guidance.  Note reference to heritage impact assessments. HIA at planning application stage does not negate the need for HIA to inform site allocations.  Amend scheduled ancient monuments to scheduled monuments, the preferred NPPF term.	Assessment of heritage issues has been incorporated within the assessment of sites. For some allocation sites that are of particular concern, as highlighted by Historic England, further explanation on the Heritage Assessment has been produced. This is adequate and proportionate as required by NPPF para 31.  No objections to revising the term to “scheduled monuments	Change text to state “scheduled monuments” in para 204 as a minor modification
Para 205	Broads Authority (Ms Natalie Beal,	23346	Support	Support	Support noted  Comments noted	See rep 23964

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]			Does “fit” mean that new development should relate well to its historic context?  The setting of a heritage asset is much greater than views and it is the setting of heritage assets that need to be considered not specific views.  Should “heritage assets” be used instead of “historic assets” to reflect the NPPF?	“historic assets” to be changed to “heritage assets” as a minor modification see rep 23964	
Para 205	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23964		Not sound  Replace historic assets with heritage assets in line with the terminology used in the NPPF	It is appropriate to reflect the NPPF terminology as requested	Change text to state “heritage assets” instead of “historic assets” in para 205 as a minor modification
Para 207	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23348	Support	Support  Should this state ‘public benefits’ not just benefits?  This recognises that a balance may need to be struck between development and protection and this recognition is useful. It might be helpful if this section was weighted more towards protection of the historic environment, taking a precautionary approach. The NPPF references instances where substantial harm should be exceptional (para 194/195). NPPF para 195 refers to substantial public benefits that outweigh the loss or all of 4 tests can be met.	Support noted  Comments noted  The text is worded appropriately	No change
Para 207	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23967	Object	Not sound At the start of the paragraph, make the point that harm should be avoided in the first instance	It would be useful for the supporting text to be clarified in this respect, reflecting national policy.	Change text to insert “The aim should be to avoid harm to the historic environment.” at the beginning of para 207 as a minor modification
Para 208	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23965	Object	Not sound  Replace historic assets with heritage assets in line with the terminology used in the NPPF.	It is appropriate to reflect the NPPF terminology as requested	Change text to state “heritage assets” instead of “historic assets” in para 208 as a minor modification
Para 208	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23968	Object	Not sound  Welcome reference to Heritage at Risk but it should be specifically mentioned in policy 3.	Para 208 is explanation for part of Policy 3 and states: “The policy also includes a flexible approach to the use of historic assets to achieve their retention whilst retaining their historic significance, and in this respect particular	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
					encouragement will be given to proposals for restoring those assets that are at risk of being lost." Policy 3 itself requires "avoiding harm to designated and non-designated heritage assets", and "providing a continued or new use for heritage assets whilst retaining their historic significance". The policy applies to all heritage assets, which would include those at risk. It is not necessary to separately refer to heritage assets at risk, nor appropriate as it would imply that those assets at risk were of a different status in terms of applying the policy. The avoidance of harm, retention of historic significance and seeking the continuation of an appropriate use should apply irrespective of whether the heritage asset is currently deemed to be at risk or not. Hence, there should be no change to the Policy in this respect.	
Para 210	Mr Jeremy Barlett [19588]	23634	Object	Not legally compliant Not sound Does not comply with Duty to Cooperate  Support the wording but conflicts with the plan's support for the Norwich Western Link road. This will not protect or enhance the natural environment.	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
Para 210	Ann Nix [19995]	24275	Object	Not sound  There is very little in the plan to support the enhancement of biodiversity.	Policy 3 sets out specific requirements for enhancing biodiversity that will apply to development	No change
Para 212	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23648	Support	Support Design features such as specific bricks providing a nest site for swifts are easy to incorporate and deliver and a simple example of net gain.	Support noted  Comments noted. As it deals with strategic policies the plan does not go into specific design details.	No change
Para 218	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23882	Object	Not legally compliant Not sound	The Norfolk GIRAMS is subject to approval by the Norfolk Local Planning Authorities and expected in the near future	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 plan does not comply with the Habitat Regulations. It fails to provide sufficient measures to ensure that adverse effects on European Sites from visitor pressure would be avoided. The inclusion in Policy 3 of a requirement for visitor pressure to be addressed in planning applications is welcomed, but the necessary measures (as in GIRAMS) have not been approved.		
Para 220	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23649	Support	Support.  The fund for mitigation measures will need to be managed effectively. It will need to support the maintenance of wildlife site infrastructure.	Support noted  Comments noted	No change
Para 222	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23969	Object	Not sound  Replace "Historic Environment assets" with "heritage assets", the preferred term and in line with the NPPF.  Add: "Green Infrastructure can have a role to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history".	It is appropriate to reflect the NPPF terminology as requested.  It would be useful for the supporting text to be clarified in respect of GI and the historic environment.	Change text to state "heritage assets" instead of "historic environment assets" in para 222 as a minor modification.  Change text to add "As well as being of importance for the natural environment, Green Infrastructure can have a role to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history." at the end of para 222 as a minor modification.
Para 223	Norfolk Biodiversity Partnership (Mr Martin Horlock, Environment Manager) [13115]	23884	Support	Support  There should be a dedicated Green Infrastructure Strategy and there should also be consideration of the sustainable funding for long term management of these spaces.	Support noted.  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
Map 8A/B	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23650	Object	<p>Not legally compliant Not sound Does not comply with Duty to Cooperate</p> <p>The green infrastructure corridors suggest access will be promoted along routes which pass or lead to legally protected sites, and they extend into neighbouring areas.</p> <p>The map is too simplistic, it should have a RAG rating approach describing limiting factors such as disturbance of wildlife or deterioration of infrastructure which will result from an increase in recreational activities.</p>	<p>The Green Infrastructure Corridors map illustrates the main corridors for GI and is diagrammatic though reflecting features on the ground. It primarily identifies corridors of value for wildlife, or where enhancements to link areas are desirable. Some corridors may have public access, but any future provision would have regard to potential impacts on protected sites. Further, more detailed information on GI is provided through other documents.</p>	No change
Policy 3	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23343	Support	<p>Support</p> <p>First bullet-point -Is the reference to HIA needed, Govt guidance states it is required if a heritage asset or its setting is affected.</p> <p>second bullet point – ‘public benefits’ might be better wording than ‘benefits’. Should the emphasis be on avoiding harm to Heritage assets?</p> <p>‘importance of the heritage asset’, might be better as ‘significance of the heritage asset’, as per the NPPF ?</p> <p>‘ancient trees and woodland’ could be broadened out to include other trees of value.</p>	<p>Support noted</p> <p>Comments noted</p> <p>The text is worded appropriately</p>	No change
Policy 3	Chet Valley B-Line (Mr Andrew Milner) [19869]	23453	Object	<p>Not sound</p> <p>Unable to tell if the GI Corridors include all the Norfolk B-Lines, including the Chet Valley B-Line.</p> <p>SMART targets need to be applied to BNG.</p> <p>All LAs should use the same measurement tool.</p> <p>All LAs need to access specialist ecology advice.</p> <p>Developers should be penalised if they reduce the sites biodiversity value before submitting applications; and the BNG 10% gain should be time specific and prior to the developer relinquishing responsibility for the site.</p>	<p>The Green Infrastructure Corridors map illustrates the main corridors for GI and is diagrammatic though reflecting features on the ground. It primarily identifies corridors of value for wildlife, or where enhancements to link areas are desirable.</p> <p>Comments noted. The text is worded appropriately</p>	No change
Policy 3	Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23503	Support	Support	Support noted	No change
Policy 3	Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23525	Object	<p>Not sound</p> <p>The objectives of Policy 3 are not achieved at Site Allocation GNLP2143: Land south of Le Neve Road</p>	Policy 3 will apply to all development proposals	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 3	Roger Carter [19915]	23591	Object	<p>Not sound</p> <p>The Norwich Western Link Road should not be included in the Plan.</p> <p>There is no coherent policy on climate change, and no carbon budget for the area.</p> <p>The housing numbers are more than the government requires, in excess of what is environmentally sustainable.</p> <p>It is not "balanced sustainable development" and does not comply with UN Sustainable Development goals.</p>	<p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p> <p>The issue of climate change is addressed through the strategy and individual policies of the Plan. A carbon budget is not required for the Plan.</p> <p>Housing numbers include a buffer to compensate for sites that do not come forward for development.</p> <p>The Plan balances the different elements that comprise sustainable development and sets out policies to achieve the objectives.</p>	No change
Policy 3	Taylor Wimpey [19920]	23626	Support	Support	Support noted	No change
Policy 3	Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]	23674	Object	<p>Not legally compliant</p> <p>For biodiversity net gain it should not specify a requirement above 10%. The prefix "at least" should be deleted. This would not prevent a developer from going further but it ensures clarity to decision makers that a scheme delivering a 10% net gain is compliant with the legislation.</p> <p>The cost of biodiversity net gain has not been included in the viability assessment.</p>	<p>Inclusion of "at least" is to indicate that the 10% requirement is not a maximum but can be exceeded. If the policy was specifically for "10%" then any amount that deviated from this would be contrary to policy which would prevent developers providing more if they wished.</p> <p>The viability assessment has included an allowance for such costs.</p>	No change
Policy 3	Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]	23683	Object	<p>Not sound</p> <p>The policy needs to be clearer on what benefits might override harm to wildlife sites such as achieving 10% net biodiversity gain.</p>	<p>The policy is appropriately worded. The potential benefits are varied and would depend on the particular circumstances of each case.</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
Policy 3	The Norwich Society (Laura Davey, Coordinator) [19930]	23684	Object	Not sound  Part of the policy goes against the NPPF. The claimed existence of “overriding benefits” can be used to trump the duty of “avoiding harm”. The ‘necessity’ rule in the NPPF is missing.	The policy is appropriately worded and reflects the NPPF. “Avoiding harm” applies as a principle, but this does not discount the need to consider other benefits that might arise.	No change
Policy 3	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23783	Object	Not sound  The Water Framework Directive should be referenced as should water and water quality and the Water Cycle Study. It should state that development should be located in areas to avoid harm to the natural environment.	In accordance with the NPPF Local Plans should be concise and avoid excessive detail. It is not necessary for Policy 3 to reference the Water Framework Directive, water quality and the Water Cycle Study. The Water Cycle Study is available as part of the evidence base and addresses issues relating to the Water Framework Directive and water quality.  Policy 3 sets out the strategic policy for protecting the environment. This will be applied together with other relevant policies, such as in Development Management Local Plans, together with locational policies for development such as allocations. As such the development is directed away from sensitive areas. It is not necessary not appropriate to state that “development should be located in areas to avoid the natural environment” as that would be widely opened to interpretation and so not give the clear guidance required of a Local Plan policy.	No change
Policy 3	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23803	Support	Support the requirement to provide 10% biodiversity net gain	Support noted	No change
Policy 3	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]	23927	Support	Support. Further provisions that on crime prevention / secure by design issues would be welcome.	Support noted  Comments noted	No change
Policy 3	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23970	Object	Not sound  Make the policy more locally specific in order to make a positive contribution to local character and distinctiveness.	The GNLP is a strategic plan, and Policy 3 is written accordingly. The Greater Norwich area encompasses the city of Norwich, urban fringe, towns, hundreds of villages and smaller settlements, and large areas of intervening countryside. As such there is great variation in local character and distinctiveness. It is not feasible for the policy to be “locally specific” for all	No change  Re BP2 - If the Inspector is minded to make a change, inserting “in accordance with the requirements of the NPPF ” at the end of BP

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>BP1 - Welcome the requirement for heritage impact assessment to accompany proposals for development (but also needed for local plan sites).</p> <p>BP2 - Harm should be avoided in the first instance. And the tests are more subtle than implied. Suggest adding the phrase, 'in accordance with the requirements of the NPPF' to help clarify.</p> <p>BP 3 - reference the need to address Heritage at Risk. Include a separate paragraph in the policy after 'importance of the heritage asset.' To read, 'The Councils will maintain and update the Heritage at Risk Register and develop a strategy for addressing Heritage at Risk.'</p>	<p>this variety, but it does set out the strategic policy for considering the importance of local character. As stated in the policy, this starts with the Development Strategy of the Plan having regard to retaining the settlement structure and retaining the separate identities of settlements, with specific requirements in the Policy to "create a distinct sense of place and enhance local character". Hence, there should be no change to the Policy in this respect.</p> <p>BP1 – comments noted. See Rep 23966 re HIA for local plan sites.</p> <p>BP2 – "avoiding harm" is the starting point for this element of the Policy. As a strategic "over-arching" policy it does not go into a high level of detail. The NPPF policies will apply, and in accordance with NPPF para 16(f) it is not necessary to replicate the NPPF. The supporting text at Para 207 relates to this element of the Policy and includes a reference to being in accordance with national policy (i.e. the NPPF), therefore it is felt that the change sought to BP2 is not necessary. However, if the Inspector is minded to make a change, inserting "in accordance with the requirements of the NPPF" as a Proposed Modification, then the GN authorities have no objection to this.</p> <p>BP3 – the requested change, to refer to the Council maintaining a Heritage at Risk Register and developing a strategy for Heritage at Risk, would not be a planning policy but would relate to the administrative functions of the individual Councils. As such it is not appropriate for inclusion in a Local Plan.</p>	<p>2 as a Proposed Modification, then the GN authorities have no objection in principle to this.</p>
Policy 3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24069	Object	<p>Not sound</p> <p>The cost of 10% net biodiversity gain has not been included in the viability assessment.</p>	The viability assessment has included an allowance for such costs.	No change
Policy 3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24101	Object	<p>Not sound</p> <p>The cost of 10% net biodiversity gain has not been included in the viability assessment.</p>	The viability assessment has included an allowance for such costs.	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 3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24121	Object	Not sound  The cost of 10% net biodiversity gain has not been included in the viability assessment.	The viability assessment has included an allowance for such costs.	No change
Policy 3	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24157	Object	Not sound  The policy should be amended to include a mechanism for the delivery of off-site biodiversity net gain.	The policy allows for both the on-site and off-site provision for biodiversity net gain.	No change
Policy 3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24267	Object	Not sound  The cost of 10% net biodiversity gain has not been included in the viability assessment.	The viability assessment has included an allowance for such costs.	No change
Policy 3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24279	Object	Not sound  The cost of 10% net biodiversity gain has not been included in the viability assessment.	The viability assessment has included an allowance for such costs.	No change
Policy 3	Mrs Nicole Wright [14312]	24404	Object	Not sound  Does not provide any clear guidance on the GI need to be met.	The policy sets out clear requirements for the provision of GI by developments. The nature of such provision would depend on the specific circumstances of the development, scale, type of development, location, opportunities for enhancements etc.	No change
Policy 3	Mr Andrew Cawdron [12806]	24415	Object	Not sound  The natural environment remains unprotected and aspirations for 'bio-diversity' net gain cannot be achieved by planting 100 twigs to replace a 100 year old oak. Ecology systems are time dependant and not resistant to disruptions, interruptions, sterile periods (.e.g. during construction) and later minimal, spaced at intervals, landscaping.	Policy 3, together with other policies in the Plan and other Local Plans, provides appropriate protection for the natural environment as applicable to development proposals.	No change
Policy 3	Mr Andrew Cawdron [12806]	24420	Object	Not sound  Policy 3 places environmental protection and enhancement onto individual development proposals, but adds an overriding dominant factor of benefits and minimising harm, (without explanation of what is considered to be a benefit).  The reference to Natural England Accessible Natural Greenspace Standard does not mention the remainder of the standard re distances to greenspace. The GNLP fails in how the current environment equates to these	Benefits can be varied and they would be judged as part of specific proposals.  Natural England's ANGST is a guide that has been taken into account in the development of a particular element of Policy 3. As a planning policy it applies to new development proposals, and the requirement for them to make appropriate provision for that development. It is not intended for such development to address shortfalls against the ANGST elsewhere.	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>standards nor provides any plans for any rebalance necessary.</p> <p>Avoidance of biodiversity harm should be the principle consideration before deciding whether mitigation is acceptable.</p> <p>Clarity is required on the maintenance or management of green spaces.</p>	Avoidance of harm is the starting point, but it has to be accepted that because of other considerations some harm may occur; if so, then mitigation is appropriate to address this.	
Policy 3	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24428	Object	<p>Not sound</p> <p>An updated evidence base is needed and a new approach should be considered for allocation of significant amounts of land for enhancements, that can help mitigate carbon emissions and other impacts of development. The proposed residential development drain the existing POS provision and new POS will likely not address the biodiversity implications of development, due to its sporadic and ad hoc nature.</p>	The policies in the GNLP and other Local Plans, such as Development Management Policies Local Plans, set out the requirements for open space provision, including GI, formal and informal recreational space and play-space. As such it should not be a drain on existing resources. The provision would need to be appropriate for that development and in the context of the local area, and could include off-site provision and so avoid the sporadic provision that might occur in small developments.	No change
Policy 3	David Lock Associates (Heather Pugh, Partner) [20014]	24455	Object	<p>Not sound</p> <p>Clarification is needed on:</p> <ul style="list-style-type: none"> <li>- the justification for biodiversity net gain of at least 10% greater than the existing situation.</li> <li>- the mitigation contribution of £205 (and not £185.93 as in GIRAMS).</li> </ul> <p>Policy 3 should include an additional bullet point to allow for the ability to deliver on-site mitigation in response to locationally-specific identified impacts as an alternative to a 'per dwelling' contributions to finance mitigation measures which in practice could be a considerable distance away from the resident population.</p>	<p>Biodiversity net gain should not be an insignificant amount in order to be worthwhile. The 10% figure is seen as being sufficiently significant without being excessively demanding, and also reflects the figure suggested by Government.</p> <p>The mitigation contribution of £205 reflects the figure in the draft GIRAMS. The final GIRAMS has amended this to £185.93. Therefore, it is proposed that a factual correction will need to be made to Policy 3 to reflect this as a minor modification.</p> <p>Policy 3 allows for onsite or off-site to provide GI / open space to meet the requirements for residents of that development. This provision will help in the avoidance of impacts on the European status wildlife sites. However, it is likely that some impacts will occur as residents are likely to still visit such sites. Therefore a contribution to mitigation measures for the impacts at the European sites is still necessary.</p>	In Policy 3 amend the figure of £205 to £185.93 as a minor modification, being a factual correction.
Policy 3	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24474	Object	<p>Not sound</p> <p>Policy 3:</p> <ul style="list-style-type: none"> <li>• does not make it clear that there is a hierarchy of</li> </ul>	The GNLP is a strategic plan, and Policy 3 is written accordingly. In accordance with the NPPF Local Plans should be concise and avoid excessive detail. It is not necessary for Policy 3 to go into the level of detail suggested. Such	<p>No change</p> <p>(But no objection in principle to some modifications being made</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>avoiding, mitigating and then compensating significant harm (NPPF para 171);</p> <ul style="list-style-type: none"> <li>• does not contain criteria against which any proposed development affecting designated sites will be judged (NPPF para 175);</li> <li>• does not make clear the distinctions between the hierarchy of designated sites and landscapes so that protection is commensurate with their status and gives appropriate weight to their importance (NPPF para 175 and para 172);</li> <li>• does not make clear that the sustainable development presumption does not apply where development requiring appropriate assessment is required (NPPF para 177);</li> </ul> <p>and</p> <p>does not make explicit reference to either project level Habitats Regulations Assessments (HRAs), or potential compensatory measures, as being required in relation to those allocations which have likely significant effects on European habitats sites.</p> <p>The Local Plan needs to provide a comprehensive strategic document, rather than Maps 8A and 8B, that sets out how the development proposals in the Plan will contribute to creating new GI, and protecting, expanding or enhancing existing GI, at site level, and across the Plan area, to form a cohesive GI network that delivers multiple benefits for people and the natural environment.</p> <p>New development should provide environmental net gains in terms of both GI and biodiversity. Proposals should demonstrate how the development would contribute towards new GI opportunities or enhance the existing GI network as part of the development.</p> <p>Recommend that the following text is added to Policy 3:</p> <p>"Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the project will have to be refused or pass the tests of regulation 62, in which case any necessary compensatory measures will need to be secured."</p>	<p>information is contained in other policy documents such as the NPPF and other local plans, such as Development Management Policies Local Plans, or regulatory requires such as the Habitat Regulations. Therefore, it is felt that the policy is worded appropriately. However, if the Inspector is of the view that further information / clarification is required, either as Proposed Main Modifications or Minor Modifications, then the GNLP authorities have no objection to this in principle.</p> <p>It is not the role of the plan to set out the detailed GI strategy and GI proposals for the Greater Norwich Area. This is dealt with in other documents such as the GI Strategy (that is to be updated) and the delivery plans that are produced under this.</p> <p>The Policy requires the provision of GI / open space and net gains for biodiversity. The specific proposals will arise and be considered as part of planning application proposals.</p> <p>The suggested text sets out the legal requirement for Habitat Regulations Assessments; it is not necessary nor appropriate to repeat this in Policy. The Plan has been subject to an HRA and specific evidence has been commissioned to consider impacts from visitor pressure, a known potential problem (GIRAMS). The results of the GIRAMS have been reflected in the Policy, including a requirement on development for a contribution towards mitigation. The Policy requirement will</p>	<p>if felt beneficial by the Inspector, as set out in the Council response).</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
				This amendment is also necessary due to the way in which mitigation measures for various designated sites (identified in the Plan's Habitats Regulations Assessment), have been incorporated into the wording of the relevant policies in the Plan.	apply to all relevant development. Therefore, no amendment is necessary to make the plan sound. However, if the Inspector is of the opinion that further clarification would be beneficial, then the GNLP authorities have no objection in principle to a change to supporting text e.g. as a minor modification.	
Policy 3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24520	Object	Not sound  The cost of 10% net biodiversity gain has not been included in the viability assessment.	The viability assessment has included an allowance for such costs.	No change
Policy 3	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24530	Object	Not sound  Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments	The GNLP is a strategic plan, and Policy 3 is written accordingly. In accordance with the NPPF Local Plans should be concise and avoid excessive detail. It is not necessary for Policy 3 to go into the level of detail suggested. The policy includes: "Development proposals will be required to conserve and enhance the built and historic environment through:  - being designed to create a distinct sense of place and enhance local character taking account of local design and other guidance ...." Such guidance would include things like Historic Landscape Character and Landscape Character assessments. It is not necessary to refer to HLC / LC in the same way as it does not list all the other types of guidance that might be applicable. However, if the Inspector is of the opinion that further clarification would be beneficial, then the GNLP authorities have no objection in principle to a change e.g. to insert "such as Historic Landscape Character and Landscape Character Assessments" after "local design and other guidance" as a minor modification.	No change  (But no objection in principle to a modification being made if felt beneficial by the Inspector, as set out in the Council response).
Policy 3	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24531	Object	Not sound  There would appear to be a lack of heritage evidence to date. In particular we would highlight the need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.  Any evidence base should be proportionate.	As set out in the NPPF the evidence base for Local Plans should be proportionate. It is not necessary to undertake excessive evidence gathering. The GNLP evidence base includes a number of specific pieces of work that have been undertaken, but behind this there is a wealth of general information that is available and also utilised e.g. listed building information, Conservation Area Appraisals etc.	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>A Topic Paper is being produced relating to Policy 3 which includes heritage issues.</p> <p>Assessment of heritage issues has been incorporated within the assessment of sites. For some allocation sites that are of particular concern, as highlighted by Historic England, further explanation on the Heritage Assessment has been produced. This is adequate and proportionate as required by NPPF para 31.</p> <p>Specific evidence on tall buildings is not necessary for the Plan. Adequate evidence is available through existing documents.</p>	
Policy 3	Iceni Projects Ltd (Mr James Waterhouse) [20001]	24551	Object	<p>Not sound</p> <p>BP2 - in historic environment section needs to be updated to fully reflect the approach set out at paragraphs 193-197 of the NPPF. The NPPF requires different levels of benefits and justification depending on the significance of the asset and the extent of harm generated. Also, it is unclear how "historic character" is defined and how this reference in the policy relates to terms used in the NPPF.</p> <p>The natural environment section re "overriding benefits" needs clarifying with reference to the NPPF.</p> <p>References to biodiversity net gain will need to be updated to reflect the requirements set out in the Environment Act once this is enacted.</p>	<p>The Policy is in accordance with the NPPF which is also a consideration in determining development proposals. It is not necessary for the GNLP to repeat the NPPF. Similarly, the GNLP is a strategic plan and does not go into a high level of detail, that might be appropriate for other local plans such as Development Management Policies Local Plans. Such other plans will also apply and the GNLP does not need to replicate these.</p> <p>"Benefits" can be varied and they would be judged as part of specific proposals.</p> <p>Depending on the progress of the Environment Act and its enactment, it may be appropriate to make changes to the Plan before its adoption or address any matters through a future review of the Plan</p>	No change.

**Policy 4 - Strategic Infrastructure**

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 224	Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	23941	object	The text and policy aspirations could go much further, particularly on scale of modal shift and reduction of car miles needed to reach net carbon emissions.	<p>There are a number of strategies looking at these issues. The GNLP has been informed by the Walking and Cycling Strategy for Norfolk that sets out the Norfolk County Council vision of cycling and walking. The needs for walking and pedestrian infrastructure are currently being looked at through the emerging Local Cycling and Walking Infrastructure Plan.</p> <p>The theme of reducing carbon emissions is also carefully considered in Policy 2, where each development coming forward will be required to promote low carbon development and help to address climate change.</p> <p>The emerging Transport for Norwich Strategy and draft Local Transport Plan 4 contain policies that underpin sustainable transport networks across the Greater Norwich area.</p>	No change
231	Coltishall Parish Council (Mrs Rebecca Furr, Parish Clerk) [14396]	24540	object	Failure to follow NPPF guidance on sustainable transport (section 9). The policy of dispersion rather than concentration is contrary to guidance in para 103 of the NPPF. No specific proposals on public transport, cycling or walking. Too much emphasis on environmentally damaging transport schemes such as NWL and aviation industry. No clear proposals for sustainable transport.	<p>The strategy is not for dispersed development. The great majority of growth is in the Norwich urban area, towns and larger villages. An element of the growth is in village clusters to support local services.</p> <p>There are a number of strategies looking at walking and cycling issues. The GNLP has been informed by the Walking and Cycling Strategy for Norfolk that sets out the Norfolk County Council vision of cycling and walking. The needs for walking and pedestrian infrastructure are currently being looked at through the emerging Local Cycling and Walking Infrastructure Plan.</p> <p>The theme of reducing carbon emissions is also carefully considered in Policy 2, where each development coming forward will be required to promote low carbon development and help to address climate change.</p> <p>The emerging Transport for Norwich Strategy and draft Local Transport Plan 4 contain policies that underpin sustainable transport networks across the Greater Norwich area.</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
240	Dr Matthew Tomlinson [17696]	23342	object	The inclusion of NWL is incompatible with Norfolk county councils climate change statement and its inclusion in the GNLP is therefore unsound. The proposed link road goes against the objectives of County Council's 25 year environment plan.	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
240	Mr Jeremy Barlett [19588]	23635	object	Objection to NWL on the grounds of environmental damage	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No Change
240	David Pett [19977]	24138	object	Objection to NWL on the grounds of environmental damage, on behalf of Stop the Western Link Campaign	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted)	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
					including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	
240	David Pett [19977]	24139	object	Objection to NWL on the grounds of environmental damage, on behalf of Stop the Western Link Campaign	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
240	Mr Michael Nix [20005]	24399	object	Objection to NWL on the grounds of environmental damage	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
251	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24227	object	Main concerns are the cumulative impact of the growth on infrastructure particularly power which has been identified as a constraint in this area in the Greater Norwich Energy Study April 2019. Sufficient water resources both supply and waste management is also a concern.	Significant engagement has taken place and is continuing on power and resources.  Policy 4 commits GN Local authorities to work with utility providers for the timely delivery of improvements.	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
				Also concerned with growth aspirations along the A47 at Honingham Thorpe; and A11 at Hethel and Silfield which would further put pressure on infrastructure in the area	GN welcomes Breckland DC's involvement in such discussions through Norfolk Strategic Planning Framework.	
256	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23806	object	AW has previously asked the policy text to be amended relating to lobbying of utility companies, this has been changed, but the supporting text still refers to lobbying Anglian Water in respect of improvements to the wastewater network.	Text could be amended.	For discussion at examination
257	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23651	Support	Before considering the potential for further impact on these sites and species RSPB suggests redressing the balance towards more natural, historical conditions	Support noted. The plan includes the highest water efficiency requirement that is allowed nationally through policy 2	No change
257	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23809	Object	Wants the term water infrastructure to be changed to water recycling centres.  Suggest text change to "To ensure that development does not have a detrimental impact on the water environment, particularly in relation to water quality and the potential for impacts on the water-based sites protected under the Habitats Regulations Directive, major development will be dependent on the water [recycling] [new word] infrastructure being capable of accommodating the development or being able to be made so."	Noted	For discussion at the examination
258	RSPB (Mr Ian Robinson, Conservation Officer) [19910]	23652	object	Not sufficient emphasis in policy on water issues, particularly on the importance of the Water Cycle Study. More details need to be provided on issues stated in the study such as capacity limitation in Whitlingham Trowse.	Anglian Water (AW) provides water and water recycling infrastructure for the Greater Norwich area. AW's Water Recycling Long Term Plan (2019) identified the need to increase drainage capacity through Sustainable Drainage Systems (SuDS) and upsizing sewers within the Whitlingham catchment.  The above plan also states the investment plan to address growth needs in Water Recycling Centres.  The policy promotes implementation of this.	No change
258	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23784	Support	Concern not enough emphasis has been given to the importance of Water Cycle Study. The local plan would benefit in highlighting key findings/recommendations from the study. Prefer a separate foul water policy.	Noted.	No change, can be discussed at the examination.

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Section 5 Policy 4	CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	23438	object	Objection to the plan's support for the Norwich Western Link as it is incompatible with climate change statement within other parts of the plan.	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
Section 5 Policy 4	Mrs Janet Skidmore [19326]	23504	Support	Promoting a site south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320), if identified as an alternative allocation or contingency site, would make appropriate planning obligations for infrastructure.	Noted	No change
Section 5 Policy 4	Noble Foods Ltd [19330]	23526	Support	Promoting a site Fengate Farm in Marsham (Site Ref. GNLP3035), if identified as an alternative allocation, would make appropriate planning obligations for infrastructure including education, and could also include open space and allotments if required.	Noted	No change
Section 5 Policy 4	Taylor Wimpey [19920]	23627	Support	Promoting a site at land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172) it was recommended that planning obligations were required for affordable housing, open space, landscape and ecological enhancement, and management of the open space.	Noted	No change
Section 5 Policy 4	Mr Jeremy Barlett [19588]	23636	Object	Objection to the plan's support for the Norwich Western Link on the ground of environmental damage	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and	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
					Enhancement), together with all other material considerations.	
Section 5 Policy 4	Environment Agency (Eastern Region) (Ms Jo Firth, Team Leader) [13069]	23832	Object	No mentioning of waste water Infrastructure or address the issue of water quality. There is also no mentioning of Water Framework Directive.	Anglian Water (AW) provides water and water recycling infrastructure for the Greater Norwich area.  AW's Water Recycling Long Term Plan (2019) identified the need to increase drainage capacity through Sustainable Drainage Systems (SuDS) and upsizing sewers.	No change, can be discussed at examination
Section 5 Policy 4	Norfolk Wildlife Trust (Mr Mike Jones) [17875]	23877	Object	Objection to the plan's support for the Norwich Western Link on the ground of damage to wildlife.	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
Section 5 Policy 4	Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	23887	Object	Policy 4 should be amended, take reference to Waste water out, to be effective in relation to the terminology used and for consistency with the findings of the Habitats Regulation Assessment in respect of water quality and the integrity of Natura 2000 sites	Noted	No change, can be discussed through minor modification or at examination
Section 5 Policy 4	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]	23929	Object	The requirements of Norfolk Constabulary are included within the strategic infrastructure element of policy 4, like the health Infrastructure	Noted  We accept infrastructure needs identified in the plan and Appendix 1.	Can be discussed through minor modification or at examination
Section 5 Policy 4	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning	23933	Object	Appendix 1 of to the Plan should include provisions in the Police Infrastructure Delivery Paper.	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
	Consultancy) [14146]				When the detail of the infrastructure required has been provided its inclusion in the plan can be considered.	
Section 5 Policy 4	Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	23942	Object	The plan does not have adequate policies addressing carbon reduction and climate change, and promoting more sustainable form of transport. Suggest revised wording in policy 4 in Transport	We have climate change policies throughout the plan. The climate change statement sets out the broad ranging approach to addressing climate change in GNLP.	No change
Section 5 Policy 4	Peter Cutting [19973]	23946	Object	Objection to the plan's support for the Norwich Western Link on the ground of environmental damage.  Not enough emphasise on cutting down carbon emission and addressing climate change.	There are a number of strategies looking at these issues. The GNLP has been informed by the Walking and Cycling Strategy for Norfolk that sets out the Norfolk County Council vision of cycling and walking. The needs for walking and pedestrian infrastructure are currently being looked at the emerging Local Cycling and Walking Infrastructure Plan.  The theme of reducing carbon emissions is also carefully considered in Policy 2, where each development coming forward will be required to promote low carbon development and help to address climate change.  The emerging Transport for Norwich Strategy and draft Local Transport Plan 4 contain policies that underpin sustainable transport networks across the Greater Norwich area.	
Section 5 Policy 4	Bidwells (Mr Iain Hill, Partner) [16273]	24083	Object	Consideration should be given to the implications for development viability on some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. the requirement to provide schools and health centres on land which otherwise would be land developable for alternative uses and which is required to facilitate growth in the wider area, not just to meet demand generated by the site itself. The policy should be amended to make provision for a reduction in other policy requirements, such as affordable housing, where appropriate and demonstrated to be justified, in order to ensure that developments required to delivery strategic infrastructure are viable.	Affordable housing requirements are addressed in policy 5.	No change
Section 5 Policy 4	Pigeon Investment Management Ltd (Mr Rob Snowling,	24102	Object	Please see the section addressing Policy 4 in the attached representations submitted on behalf of the Trustees of the WJ Gowing 1985 Settlement and the Trustees of the Howard Trust and Pigeon Capital Management 2 in support of the allocation of Land north of Brecklands Road, Brundall (site GNLP0352). Wrong website link to GNLP in para 259.	Noted. The consideration of land availability for education has been looked at through the allocation stage and this site has not been allocated.	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
	Associate Director) [13863]			Re the specific land, it should be allocated to meet the longer term education needs of the settlement.		
Section 5 Policy 4	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24122	Object	Please see the section addressing Policy 4 in the attached representations submitted on behalf of Michael and Jackie Buxton and Pigeon Capital Management 2 Ltd in support of the allocation of Land at Dereham Road, Reepham (site GNLP0353R).  Objection made on the grounds of that the policy has not made sufficient provision for health care infrastructure. There is no public viewing of Health Infrastructure Delivery paper.	Noted. As set out in appendix 1, the Greater Norwich Local Plan Infrastructure Needs Report has been informed by input from the health care providers.	No change.
Section 5 Policy 4	David Pett [19977]	24141	Object	Objection to the plan's support for the Norwich Western Link on the ground of environmental damage, submitted on behalf of Stop the Wensum Link Campaign.	The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	No change
Section 5 Policy 4	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24158	Object	Concern that shortage of delivery in housing number has not led to the timely delivery of Long Stratton Bypass.	Work is progressing to secure funding for the delivery of Long Stratton bypass and it has been given conditional approval for significant level of public funding. The outline business case is with government and anticipated is 2024.	No change
Section 5 Policy 4	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24228	Object	Breckland DC has concern that cumulative impact of growth identified in the plan on power and water resources and waste management  Concern that growth aspirations along the A47 and A11 which would further put pressure on the Infrastructure in the area. There is mention that Duty to Co-operate has not been discharged.	Significant engagement has taken place and is continuing on power and resources.  Policy 4 commits the GN local authorities to work with utility providers for the timely delivery of improvements.  GN welcomes Breckland DC's involvement in such discussions through Norfolk Strategic Planning Framework.	No change

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Section 5 Policy 4	Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	24393	Object	Re site GNLP0132 in Sprowston, the policy fails to acknowledge that the requirement to accommodate or deliver strategic infrastructure may have implications for the viability of some of the larger strategic sites.	This relates to viability of a specific site on which discussions are taking place with a view to signing a Statement of Common Ground if necessary.	No change required.
Section 5 Policy 4	Mr Andrew Cawdron [12806]	24417	Object	Objection over the number of housing numbers, objection over the NWL, not enough emphasise on policies on environment change and carbon reduction	This is dealt with in responses in other parts of the plan. The plan is founded on evidence of local needs.	No change
Section 5 Policy 4	Mr Andrew Cawdron [12806]	24423	Object	The changes between the Reg18C draft plan and the Reg 19 version include a significant increase in housing numbers, which has not been subject to public consultation. Furthermore, the latest Government advice from December 2020 is that the 2017 method of calculating housing requirement would continue, negating the need for the additional housing and buffer.  Objection to NWL on environmental grounds, more emphasis on carbon reduction in policy, revise house number and job number.	This is dealt with in responses in other parts of the plan. The plan is founded on evidence of local needs.  The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	
Section 5 Policy 4	David Lock Associates (Heather Pugh, Partner) [20014]	24456	Object	There is a covering letter re a site GNLP4057(A-C) – PARK FARM, SILFIELD.  Objection to the transport criteria used in selection of sites. Concern that up to date background transport evidence has not been used, as LTP4 is still in draft stage, TfN is out of date.  Lack of up to date transport planning means there is a disconnect between the GNLP climate change ambitions and the local transport policy framework, namely too much emphasise on road and car usage. There is disconnect between sustainable transport and spatial growth planning.	Draft LTP4 is currently being progressed. TfN is in the process of being reviewed, to provide an up to date context to support the delivery of sustainable growth in a transport context.	No change
Section 5 Policy 4	Natural England (Ms Louise Oliver, Planning	24475	Object	The plan does not provide any level of detail regarding the delivery of strategic Green Infrastructure (GI).	The publication version of the GNLP includes a vision which seeks “significant further improvements to our extensive green infrastructure network”, and policies 1, 2, 3, 4 and 7 which	Minor modifications to paras. 224 and 259, footnote 81 and the glossary are required for

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
	and Biodiversity Advisor) [13804]			<p>Para 224. We think this should reference the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR) rather than the Greater Norwich Local Plan Infrastructure Report (GNLPIR), which does not appear to exist</p> <p>No reference to GI in Appendix 1.</p>	<p>support further development of the green infrastructure network to provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• Policy 2 requires on-site GI provision to link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4.</li> <li>• Policy 3 - Based on the NSPF work, supporting text and maps set out the GI network which is to be further developed and enhanced through the plan to 2038. With significant involvement from Natural England, enhancement of the GI network has now been in development in Greater Norwich for over a decade in accordance with the Greater Norwich Green Infrastructure Strategy and delivery plans, and other documents such as the River Wensum Strategy. In addition, further evidence work is being considered to identify GI priority further into the future. The policy also requires biodiversity net gain on all development.</li> <li>• Policy 4 on strategic infrastructure provides further support for enhancing the GI network, stating “In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in maps 8A and B”.</li> </ul> <p>Furthermore, sites allocated in the plan are required to enhance GI, with particular opportunities for enhancement identified.</p> <p>Overall, it is felt that that policy 4, with the other policies in the plan, in particular the GI map in policy 3, provides the level of detail on GI suitable for a strategic local plan.</p> <p>It is agreed that minor text modification is required for accuracy.</p>	<p>accuracy so that they refer to the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR).</p>

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Section 5 Policy 4	Broadland Green Party (Jan Davis, Coordinator) [19650]	24484	Object	<p>The Plan needs to address how carbon emissions are to be reduced. It does not effectively do this.</p> <p>A clear process needs to be included on how to assess and monitor carbon emissions so that progress, or lack of progress, can be monitored and publicised so that effective.</p> <p>Concern over environmental impacts of NWL.</p>	<p>LTP4 is about to be adopted, Transport for Norwich is in the process of being reviewed, to provide an up to date context to support the delivery of sustainable growth in a transport context.</p> <p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p>	No change
Section 5 Policy 4	Norwich Green Party (Ms Denise Carlo, Norwich City Councillor Green Party) [12781]	24504	Object	<p>Plan is unsound as it increases carbon emissions, contrary to the national legal target of zero by 2050.</p> <p>Incomplete transport evidence base as LTP4 is still in draft stage. No updated version of TfN. There also a separate representation that LTP4 is unsound.</p> <p>Objection over the inclusion of NWL.</p>	<p>The theme of reducing carbon emissions has been carefully considered in Policy 2, where each development coming forward will be promotes low carbon development and helps to address climate change.</p> <p>Draft LTP4 is currently being progressed. TfN is in the process of being reviewed, to provide an up to date context to support the delivery of sustainable growth in a transport context.</p> <p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning</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
					permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.	
Section 5 Policy 4	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24521	Object	<p>Refers to a specific site in Bournhouse lane. The site has not been allocated.</p> <p>Paragraph 259 of the GNLP indicates that the need for educational infrastructure has been assessed and is taken from the Greater Norwich Local Plan Infrastructure Report (GNLPIR). It is firstly unclear which document this refers to as the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR) is included in the evidence base and this links to the Greater Norwich Infrastructure Plan (GNIP) in paragraph 1.3.8. This paragraph and the glossary should be amended accordingly to provide clarity.</p> <p>There is no mechanism to secure the education infrastructure.</p>	<p>The site is being assessed on an individual basis, taken into strategic infrastructure needs.</p> <p>The consideration of land availability for education has been looked through at the allocation stage and this site has not been allocated.</p>	<p>No change</p> <p>As set out above, a minor modifications will correct the references to the GNLPINR.</p>
Section 5 Policy 4	Mr Bryan Robinson [14521]	24538	Object	<p>The plan is short of information as to the effect on transport anticipated from the correlation for housing and employment sites and the implications for climate change.</p> <p>Object to the inclusion of NWL and it is unclear in the plan of its purpose, whether it is essential to growth and merely a local improvement to reduce congestion.</p>	<p>There has been a process of identifying sites has looked at sustainability criteria, including transport.</p> <p>The theme of reducing carbon emissions has been carefully considered in Policy 2, where each development coming forward will be promotes low carbon development and helps to address climate change.</p> <p>Draft LTP4 is currently being progressed. TfN is in the process of being reviewed, to provide an up to date context to support the delivery of sustainable growth in a transport context.</p> <p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be</p>	

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					<p>sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p>	

**Policy 5 – Homes**

<b>Policy/ Map/ Para No. Etc</b>	<b>Respondent/s Name &amp; Id Ref</b>	<b>Rep ID/s</b>	<b>Support/ Object</b>	<b>Main Issues Raised</b>	<b>Council Response</b>	<b>Potential Change to Plan</b>
Policy 5 Homes, 271	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23264	Support	Supports the requirement for 33% affordable housing on new sites.	Support noted.	No change
Policy 5 Homes, 271	Mr Trevor Bennett [14599]	23391	Object	The need for more affordable housing should also include more social housing, this is particularly needed in Broadland where private housing is being used for renting at high rates, due to the fall in the number of local authority run properties.	The need for more affordable rented accommodation is recognised. Policy 5 gives scope to secure rented housing from developers, as part of a mix of tenures.	No change
Policy 5 Homes, 271	Mr Jeremy Barlett [19588]	23637	Object	More housing needs to be affordable. Too many large, luxury houses are being built. These attract people from areas with high house prices (such as London) but are beyond the budget of locals, especially younger people hoping to own their first home.	The need for more homes for young people is recognised. Policy 5 gives scope to secure a mix of affordable housing, including smaller properties. The size of private sale homes is partly driven by the market.	No change
Policy 5 Homes, 271	Mr Andrew Driver [17078]	23723	Object	The plan needs to do more to ensure that the right type of housing is built in future. Given that private developers consistently and continually renege on their requirements to provide social and affordable housing as part of their developments, the plan should be proactive in preventing this in the future. The local authorities should take responsibility for building social housing for rent and also not allow private developers to cut numbers of social and affordable housing. Developers must be held to deliver on plans that are submitted with no reduction in social housing after approval by the planning authority.	Local authorities do endeavour to ensure the right types, tenures and sizes of properties are built. Local authorities use their own resources to build houses and apply their planning powers to ensure private developers contribute affordable housing. It should also be pointed out that private developers recognise their obligations to provide affordable housing. Rules for testing viability are set out in national planning guidance, which the Greater Norwich authorities are following to ensure affordable housing is provided.	No change
Policy 5 Homes, 271	Mr Richard Taylor [19828]	23737	Support	When people talk about the 'housing crisis', they mean that young people are not able to get on the ladder, or not being able to access secure rented accommodation. With this in mind, the requirement to include 33% 'affordables' on developments above a certain size is excellent and should be adhered to and not negotiated away with developers claiming that it is 'unviable'.	Support noted.	No change
Policy 5 Homes, 271	Mr Andrew Cawdron [12806]	24422 24416	Object	The Affordable Housing Need is stated at paragraph 27 I of Reg. 19 v 1.7 as 11,030 being 28% of the overall housing need as established in the 2017 SHMA Report. Assuming the affordable housing percentages will apply to the 22% buffer of allocations above the defined overall housing need, mathematics determines that the number of affordable housing units will exceed the need by 2,427 if all the sites are developed over the period.	The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger	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>The Plan does not indicate the reduced number of affordable homes which will result from the reductions in Neighbourhood plans and committed sites with approved lower percentages of affordable housing.</p> <p>All this data should be readily available to the GNLP and the plan should show the numbers of affordable houses which will be provided against this policy for meeting the overall housing need target and how this will be managed in scenarios where the overall need is not being met and if annual completions are nearer to the target including the 22% buffer.</p> <p>Without this study comparing potential extra affordable homes if the buffer is built out and reductions from Neighbourhood plans and lower approved numbers in existing commitments, the policy on affordable homes is meaningless. Change suggested by respondent:</p> <p>A straightforward solution would be to revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.</p> <p>The changes between the Reg18C draft plan and the Reg 19 version include a significant increase in housing numbers, which has not been subject to public consultation. Furthermore, the latest Government advice from December 2020 is that the 2017 method of calculating housing requirement would continue, negating the need for the additional housing and buffer. Using the 2017 method, the projected need for 20 years for Greater Norwich is around 40,000 homes, closely aligning with the Reg18C draft plan. The Norwich Wensum Link should not be included as a legal assessment made in 2016, which is still current, found that the integrity of the SAC would be adversely affected and only relatively little weight would be attached to the need to relieve congestion in the Norwich area. The GNLP attempts to distance itself from the HRA obligations connected to the NWL, which is a project which overrides a legal opinion in 2016. There is no mention of the December 2020 Government carbon target emissions reduction of at least</p>	<p>economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>As to affordable housing need, this is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of less than 10 homes which cannot be required to provide affordable housing. Consequently, the GNLP has set a 33% affordable housing requirement for the majority of sites, with a 28% requirement in Norwich city centre where development costs are higher.</p> <p>The need and supply of affordable homes is ever-changing, but evidence is kept up to date. An update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the 'pipeline' of affordable homes expected from existing committed development sites, and the most up-to-date information will be available to the inspector.</p> <p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p>	

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				<p>68% by 2030.</p> <p>To correct these issues, revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic, remove the NWL from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.</p>	<p>More generally on the point about dealing with climate change, the GNLP recognises its upmost importance. 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>Specifically in relation to addressing climate change, and contributing to government set targets for cutting emissions, Section 4 of the GNLP deals with the topic. The environmental objective of the GNLP is also clear: "To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050."</p>	
Policy 5 Homes, 275	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	24287	Object	<p>Acknowledgement in the Plan of the need for a more diverse, flexible and innovative approach to providing specialist 'retirement' housing is necessary to make the Plan sound, together with a specific identification/allocation of the site for specialist housing, in Part 2 of the Plan.</p>	<p>The approach taken is considered sound. To boost the supply of specialist older people's accommodation Policy 5 states: "<i>Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.</i>" This strategic policy approach should be helpful in encouraging older people's housing in the most sustainable and well-connected locations, such as brownfield redevelopment sites in Norwich.</p> <p>As to specific site allocations, the same approach to the selection of sites was applied for specialist older people's housing as was taken for general residential allocations.</p> <p>Considerations include access to services and public transport, which in some cases could be arguably more important for older people who for reasons of health or increasing frailty may not have access to a private car. With these points in mind, allocations for older people's specialist housing</p>	No change

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					was made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less sustainably located sites, offering specialist older people's accommodation were not selected for inclusion in the plan.	
Policy 5 Homes, 275	Mr Richard Bacon [17000]	24382	Object	<p>SME Developers and Care Home Providers: There appears to be a shortfall of sites under 50 units for SME developers in the GNLP, both currently and in the next Local Plan period. This is unsustainable for small local developers and will result in the loss of valuable skills and housing choice in Norfolk. I believe that the number of sites suitable for SME developers should be significantly increased.</p> <p>Care home providers in Norfolk also appear to have been neglected by the GNLP through the allocation process and I would like to see this addressed too.</p> <p>There were 113 people on the self/custom-build housing registers in 2018/19 alone, highlighting the demand for self/custom-build. I do not believe the GNLP's policies reflect this level of demand and I would like to see provision for self/custom-build strengthened in the GNLP.</p> <p>There appears to be a shortfall of sites under 50 units for SME developers in the GNLP, both currently and in the next Local Plan period. This is unsustainable for small local developers and will result in the loss of valuable skills and housing choice in Norfolk. I believe that the number of sites suitable for SME developers should be significantly increased.</p>	<p>Care Home Providers</p> <p>To boost the supply of specialist older people's accommodation Policy 5 states: "<i>Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.</i>" This strategic policy approach should be helpful in encouraging older people's housing in the most sustainable and well-connected locations, such as brownfield redevelopment sites in Norwich.</p> <p>As to specific site allocations, the same approach to the selection of sites was applied for specialist older people's housing as was taken for general residential allocations.</p> <p>Considerations include access to services and public transport, which in some cases could be arguably more important for older people who for reasons of health or increasing frailty may not have access to a private car. With these points in mind, allocations for older people's specialist housing was made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less sustainably located sites, offering specialist older people's accommodation were not selected for inclusion in the plan. This approach is considered to be sound.</p> <p>SME Developers:</p> <p>The Sites Plan contains a variety of different sized sites, which will provide ample opportunity for SME developers. Especially in the Broadland Villages and also via the South Norfolk Village Clusters Plan there are sites allocated for fewer than 50</p>	No change

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					homes. Furthermore, Policy 7.5 for small-scale windfall development will allow for sites that may provide for SME developers. Specifically for self/custom builders Policy 5 takes a progressive approach, prompted by legislation, government guidance, and council register data.	
Policy 5 Homes, 275	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24444 24445 24446	Object	<p>As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations. This view is also echoed in paragraph 61 of the NPPF. Schemes that propose elderly care within larger residential allocations typically provide designated cul-de-sacs or clusters of specialist accommodation that does not help in providing or reinforcing community cohesion. Instead, such schemes promote isolation from the wider locality, as these elements within large residential sites are often inwardly focused with either secluded elements of public open space or a lack of connection to wider provision on site. This undermines the aspirations of delivering a healthy and cohesive community in conflict with the aims of the NPPF ultimately resulting in an unsound strategy in conflict with paragraph 35 of the NPPF.</p> <p>Overall, the plan fails to secure a suitable strategy to deliver quality elderly accommodation in sufficient numbers to address an identified need and as such has not been positively prepared, is unjustified, ineffective, and is inconsistent with national policy. Change suggested by respondent: Many individuals have seen how traumatic it is moving loved relatives in the later years of their life to C2 institutions which often result in unfamiliar surroundings which can exacerbate deteriorating health conditions. As such, the allocation of more 'Care Village' sites, where residents can age gracefully in the relative comfort of their own homes, whilst having independence, as well as medical and social care on site for when they need it, is a better strategy to address the needs of the aging population in the GNLP area. Additionally, through the allocation of specific additional sites, the significant identified need can be better addressed.</p> <p>For example, one such site of the many needed is the Racecourse Community Park. this site promotes the</p>	<p>The issues raised here are addressed by the site assessment work, and GNLP0177-B continues to be considered unsuitable for inclusion.</p> <p>To boost the supply of specialist accommodation for older people Policy 5 states: <i>“Development proposals providing specialist housing options for older people’s accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.”</i> This strategic policy approach should be helpful in encouraging older people’s housing in the most sustainable and well-connected locations, such as brownfield redevelopment sites in Norwich.</p> <p>As to specific site allocations, the same approach to the selection of sites was applied for specialist older people’s housing as was taken for general residential allocations.</p> <p>Considerations include access to services and public transport, which in some cases could be arguably more important for older people who for reasons of health or increasing frailty may not have access to a private car. Conversely, locating older people’s accommodation in separated and isolated locations would be detrimental to creating mixed and cohesive communities.</p> <p>With these points in mind, allocations for older people’s specialist housing are made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less sustainably located sites, offering specialist older people’s accommodation were not selected for inclusion in the plan. This approach is considered to be sound.</p>	No change

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				<p>concept of creating a care village which residents can move into before the critical stage of later life begins whilst they have full cognitive functions. This would foster community cohesion as well aid in stimulating community activities. There would be great benefit in allocating site GNLP0177-B at the Racecourse Community Park for specialist older persons accommodation and care provision to address the identified need. Through the allocation of Site GNLP0177-B , the Plan would not only better address the identified need for elderly accommodation, but provide a better alternative to C2 institutions and be in keeping with the aims and objectives of the GNLP and wider national strategies and ambitions.</p> <p>As stated with the various evidence bases, there is a predicted short fall of over 3500 specialist units, if these were not to be provided across the residential allocations within the Greater Norwich Local Plan area. Incorporating so many of these in housing allocations has negative repercussions for future residents. Humans by nature thrive in communities, places where social interaction amongst like-minded and similar aged individuals helps retain and improve cognitive functions. The Racecourse Community Park provides the setting, and aspiration to deliver not only purpose-built homes in a community, but homes that would foster and encourage interactions amongst elderly occupiers and residents, whilst also being able to cater for a large dedicated variety of elderly care needs. Additionally, given the rise in suicide rates for elderly individuals due to depression and isolation it is viewed that providing more specialist accommodation clusters, such as this site in a setting which encourages outdoor social interaction could accommodate and help provide a better quality of life. This would also negate the inevitable token 3 or 4 units that will be sandwiched within large residential allocations in order to be policy compliant. As such, it is viewed that dedicated allocations of designated elderly accommodation is preferable not only for future occupiers, but also for developers aiding viability and ensuring deliverability of the residential allocations.</p> <p>Policy 5 of the Greater Norwich Local Plan relates to the provision of housing. The policy encompasses all elements of housing including affordable housing, space</p>		

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				standards, accessible and specialist housing, gypsy and traveller accommodation, purpose-built student accommodation, and self or custom build housing. Regarding the need for the provision of elderly accommodation, Policy 5 supports the incorporation of specialist accommodation within residential proposals. The Racecourse Community Park would include a significant element of specialist accommodation for the elderly and employment generating uses. The site therefore not only ties in with a wider strategic vision for the greater Norwich area but also adheres to the requirements of policy 5. It is noted that policy 5 will support specialist elderly accommodation where there is good access to local services. As part of the overall proposals for this site it is envisaged that a range of services will be provided that not only cover amenity, encouraging a healthy lifestyle, but also basic services to supplement those offered within both Hethersett and Cringleford. This is reinforced by the proposed Highways England improvement works to the A47/ A11 Thickthorn Junction Improvement scheme and the Parkland Management Plan for the Racecourse Community Park which has identified the need for minor allocations (for employment generating uses in close proximity to the Thickthorn Park & Ride extension and new link road) in support of the long-term ambitions and management strategy for the site.		
Policy 5 Homes	Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	23262	Object	<p>Further to representations made at the Regulation 18 draft consultation stage (09 March 2021) – attached - it remains our view that Policy 5 – insofar as it relates to Affordable Housing - is unsound.</p> <p>The 2017 SHMA identifies a need for 28% affordable housing; why then is the policy seeking a minimum of 33% (outside of Norwich City Centre)? The implication – although somewhat disingenuous – is that the shortfall arising from the Government policy of excluding affordable housing provision from housing developments of fewer than 10 units must be made up by inflating the evidentially-based 28% (SHMA) proportion. In effect, cross-subsidising the perceived ‘shortfall’ through major housing schemes (10 or more units). We believe there is a clear case for the Local Plan to reflect its evidence base (insofar as it relates to affordable housing) by requiring that the proportion of affordable housing sought reflects the most up-to-date needs assessment, i.e. 28%. Indeed,</p>	<p>Viability evidence prepared for the GNLP shows that across 11 different typologies the affordable housing requirement is achievable, and therefore housing delivery rates should not be impacted by these obligations. As to affordable housing need, this is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable.</p> <p>Policy 5 has been drafted to achieve the overall affordable housing delivery required. This includes recognition that some sites, including those of fewer than 10 homes, will not provide affordable housing. Consequently, the GNLP has set a 33% affordable housing requirement for the majority of sites, with a 28% requirement in Norwich city</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>that the approach adopted in Policy 4 (Housing Delivery) of the adopted Joint Core Strategy (JCS) is carried forward into the new Local Plan: "The proportion of affordable housing, and mix and tenure sought will be based on the most up to date needs assessment for the plan area." Policy 5 (Greater Norwich Local Plan) only says that "a mix of affordable housing sizes, types, and tenures..." should take account of the most up-to-date evidence, not the proportion. The proportion has changed over the Plan (JCS) period – notably since the publication of the 2017 SHMA - and has been reflected in Councils' approaches to decision making thereafter.</p> <p>There now appears to be a marked change in the Councils' approach to an evidentially-based and up-to date proportion of affordable housing, without justification. The GNDP may feel it has a case to make – other than simply to make up the overall affordable housing levels through its absence in minor (sub 10 unit) developments - but we cannot find any proper rationalisation in the emerging Local Plan, nor in its supporting evidence, including the Viability Appraisal (December 2020). This is a serious omission that should be properly addressed, to avoid adverse impacts on housing delivery and viability through the Plan period. As it stands, we contend that Policy 5 is therefore unsound.</p>	centre where development costs are higher. This approach is considered to be sound.	
Policy 5 Homes	Perseus Land and Developments [19865] Gillings Planning (Mrs Anna Gillings, MD) [19864]	23443	Object	<p>The policy confirms that 'major residential developments' defined as over 10 dwellings will require affordable housing. However, the wording relating to care homes and extra care suggests this requirement will also apply to these uses. The Viability Report (2020) is clear that no account has been taken of care homes, nor extra care, in determining the viability of affordable housing. On this basis the last sentence should be deleted as it is not evidence based. If the case is made for extra care subsequently, the policy must still state it is not required for care homes. Unsound without this amendment.</p> <p>Either:</p> <p>Delete the following:</p> <p>"..... Irrespective of C2 or C3 use class classification, specialist older people's housing will provide 33% affordable housing or 28% in the city centre."</p>	Viability evidence prepared for the GNLP shows that across 11 different typologies the affordable housing requirement is achievable, and therefore housing delivery rates should not be impacted by these obligations. All homes should meet affordable housing obligations where it is viable to do so, even those providing specialist housing for older people and which may fall within a C2 use class. On this basis Policy 5 is considered to be 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
				<p>or amend to include brackets:</p> <p>"...Irrespective of C2 or C3 use class classification, specialist older people's housing (excluding residential/nursing homes) will provide 33% affordable housing or 28% in the city centre."</p>		
Policy 5 Homes	RJ Baker & Sons [19063] Cheffins (Mr Ian Smith, Director) [17591]	23488	Object	<p>Although we support the idea of an element of self-build plots we object to the detail set out in Policy 5. Firstly, we are unsure as to the basis of the stated threshold of 40 dwelling developments and request that the Plan provides a clear justification for this level. Secondly, the wording seems confused. The policy objective is to secure, via applications, a proportion of self/custom build plots within planning permissions. The second bullet point refers to such plots not being sold after being marketed for 12 months. That situation is applicable when a developer seeks to change an existing permission (conditions or S106) and so it is not relevant to the policy aim (i.e. applications) and should be reworded.</p>	<p>The intention and wording of the Self/Custom Build policy is considered to be clear. The intention is to allow plots to be build out as completed homes for sale, in the event of low demand. As to a developer showing there is no need for plots or that they cannot be sold, the matter will be dealt with by development management planners being careful not to adversely affect the delivery of development.</p>	No change
Policy 5 Homes	Mrs Janet Skidmore [19326] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23505	Support	<p>Policy 5 deals with affordable housing and specifies that 33% of housing should be affordable from major residential sites. The affordable housing requirements are supported. It should be noted that the development currently under construction to the north of Gonville Hall Farm is delivering policy compliant levels of affordable housing. The promoted development at land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320), would provide policy compliant levels of affordable housing if identified as an alternative allocation or contingency site if identified as an alternative allocation in Draft GNLP. The infill developments and small scale developments at villages are likely to fall below the threshold for providing affordable housing. A reduced level of affordable housing contribution is required from developments in Norwich. The most recent monitoring data demonstrates that there has been a shortfall in the delivery of affordable housing. In these circumstances, all opportunities should be taken to increase the delivery of affordable housing by identify suitable additional allocations and an additional contingency site, including at land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320).</p>	<p>The issues raised here are addressed by the site assessment work, and GNLP0320 continues to be considered unsuitable for inclusion.</p> <p>More generally, the approach taken to housing numbers is considered sound. The plan will meet the government's standard methodology, and includes a suitable delivery buffer. As to affordable housing, the GNLP has set a 33% requirement for the majority of sites, with a 28% requirement in Norwich city centre where development costs are higher. This approach is considered to be sound in meeting needs identified in the SHMA.</p> <p>The need and supply of affordable homes is ever-changing, but evidence is kept up to date. An update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the 'pipeline' of affordable homes expected from existing committed development sites, and the most up-to-date information will be available to the inspector.</p>	No change

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Policy 5 Homes	SERRUYS PROPERTY COMPANY LIMITED [19895] Maddox Planning (Mr Dylan Kerai, Senior Planner) [19893]	23519	Object	<p>The draft plan states that an increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as, inter alia, care homes (275, GNLP). Consequently, the draft plan makes a specific allocation for specialised housing for older people and site allocations with an element of specialist housing. This means that the plan should support the redevelopment of vacant or unviable care homes to other uses. We therefore propose amendments to draft policy 5, so that where existing older people's accommodation and others with support needs is either unviable, vacant or it does not have good access to local services then redevelopment to residential will be supported. Amended draft policy 5 below:</p> <p>“Development proposals providing specialist housing options for older people’s accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use. Should it be demonstrated that existing older people's accommodation and others with support needs is either unviable, vacant or it does not have good access to local services then redevelopment to residential will be supported in principle. Irrespective of C2 or C3 use class classification, specialist older people’s housing will provide 33% affordable housing or 28% in the city.”</p>	In the event of existing older people’s housing becoming vacant or unviable its reuse would be considered through a planning application. This would include giving appropriate weight to considerations like location, what the site could most appropriately be used for, and whether any existing buildings could be sustainably reused. Policy 5 as drafted is considered sound and the suggested change to policy is not thought necessary.	No change
Policy 5 Homes	Noble Foods Ltd [19330] Carter Jonas LLP (Mr Brian Flynn, Associate) [12669]	23527	Support	Policy 5 deals with affordable housing and specifies that 33% of housing should be affordable from major residential sites. The affordable housing requirements are supported. The promoted development at land at Fengate Farm in Marsham (Site Ref. GNLP3035) would provide policy compliant levels of affordable housing if it is identified as an alternative allocation in Draft GNLP. As set out in the representations to Policy 7.4: Village Clusters and Policy 7.5: Small Scale Windfall Housing Development, the policy approach of limited infill sites and small scale development sites only at villages is likely to fall below the threshold where affordable housing is required and means that none will be delivered at the smaller villages. No changes to Policy 5 are required.	The issues raised here are addressed by the site assessment work, and GNLP3035 continues to be considered unsuitable for inclusion. The approach to housing provision overall, and within that affordable housing delivery, is considered sound, and no change to Policy 5 is considered necessary.	No change
Policy 5 Homes	Taylor Wimpey [19920] Carter Jonas LLP	23628	Support	Sites that are capable of delivering policy compliant levels of affordable housing need to be identified in Draft GNLP, to address the current shortfall in the delivery of affordable housing and to	Support noted.	No change

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	(Mr Brian Flynn, Associate) [12669]			As set out in the planning application for the proposed allocation at land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172) this development would deliver 33% affordable housing, which equates to 68 affordable dwellings. The fact that the proposed development would deliver affordable housing supports the decision to allocate this site in Draft GNLP. No modifications are requested to Policy 5.		
Policy 5 Homes	Home Builders Federation (Mark Behrendt, Local Plans Manager SE and E) [19601]	23675	Object	<p>The Council should:</p> <p>Reduce the affordable housing requirement to reflect the evidence on the need for such homes.</p> <p>Without the required evidence the requirement for development to meet national described space standards must be deleted.</p> <p>The requirement for 5% of homes on sites of 40 or more dwellings to be allocated to self-build or custom housebuilding should be deleted.</p>	<p>As to affordable housing need, this is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of fewer than 10 homes which cannot be required to provide affordable housing. Consequently, the GNLP has set a 33% affordable housing requirement for the majority of sites, with a 28% requirement in Norwich city centre where development costs are higher.</p> <p>The need and supply of affordable homes is ever-changing, but evidence is kept up to date. An update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the 'pipeline' of affordable homes expected from existing committed development sites, and the most up-to-date information will be available to the inspector.</p> <p>With reference to Nationally Described Space Standards, evidence was gathered from planning application data about the proportion of homes already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area. Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis the Greater Norwich authorities considered Policy 5 to be sound.</p>	No change

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					A progressive approach to self/custom-build housing is taken by the Greater Norwich authorities, prompted by legislation, government guidance, and council register data. Policy 5 seeks at least 5% of plots on residential proposals of 40 dwellings or more, with the exception of flats, and is worded so as not to apply if a lack of need for such plots is demonstrated.	
Policy 5 Homes	Bidwells (Mr Jake Lambert, Graduate Planner) [14371]	24074	Object	<p>The policy's objective of encouraging the delivery of Purpose-Built Student Accommodation (PBSA) to support the growth of the University is, in principle, supported.</p> <p>Away from the UEA campus, the draft policy states that proposals for PBSA will be supported where the need for the development is justified by the current or proposed size of Norwich's higher education institutions, and the proposals will adhere to a range of criterion.</p> <p>One of these criterion requires off-campus PBSA to make provision for a policy-compliant proportion of affordable housing that would be expected if the site were developed for general needs housing.</p> <p>This element of the policy is considered unsound, as PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64 of the NPPF specifies that, where the provision of housing is proposed, at least 10% of the homes should be made available for affordable home ownership. Paragraph 64(b) of the NPPF states that PBSA is exempt from this 10% requirement.</p> <p>On this basis, to ensure that the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to recognise that PBSA should not be expected to contribute towards affordable housing provision.</p>	The GNLP requires affordable housing as part of purpose-built student housing development on the basis that such schemes will be on scarce brownfield sites in highly sustainable locations and losing the opportunity for affordable housing obligations would detrimentally affect other communities in Norwich. In order to address this locally specific need, Policy 5 as drafted is considered sound.	No change
Policy 5 Homes	Bidwells (Mr Iain Hill, Partner) [16273]	24084 24095	Object	The policy's objective of providing a full range of types, tenure and costs of housing to meet varied housing needs is, in principle, supported. In addition, the provision of minimum space standards and requirements for adaptable homes to be provided to improve the quality of life and meet the needs of an aging population is also supported. However, there are a number of elements of the Policy that require alteration to ensure soundness.	The approach to viability testing accords with planning practice guidance. The guidance states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis, it is not thought that the wording of policy should change to explicitly allow viability testing on greenfield sites. If exceptional circumstances apply on a greenfield site, the need for a viability	No change

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				<p>Affordable Housing</p> <p>As drafted the policy states that only applications on brownfield sites will be able to challenge affordable housing provision at the application stage. The policy should, in accordance with paragraph 57 of the NPPF recognise that, notwithstanding work to inform a site allocation in the Local Plan, a viability assessment can be submitted at the application stage. The NPPF advises that the weight afforded to the viability assessment at the application stage will be a matter for the decision maker and will have regard to all circumstances in the case, including whether the evidence underpinning the local plan is up to date and whether there has been a change in circumstances since the plan was brought into force.</p> <p>On this basis, to ensure the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.</p> <p>Space Standards</p> <p>Whilst the intention to adopt the Government's Nationally Described Space Standard (NDSS) is readily acknowledged, it is essential that the policy explicitly provides the necessary justification, as required by footnote 46 of paragraph 127 NPPF. This clearly states: "Policies may also make use of the nationally described space standard, where the need for internal space standard is justified".</p> <p>This justification is essential, as strict adherence to space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. For example, in terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow those on lower incomes to afford a property which has their required number of bedrooms. At this stage, notwithstanding the PPG, there would appear to be no robust evidence that would suggest that development below space standards is a particular concern throughout</p>	<p>appraisal will be determined at the planning application stage.</p> <p>With reference to Nationally Described Space Standards, evidence was gathered from planning application data about the proportion of homes already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area. Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis the Greater Norwich authorities considered Policy 5 to be sound.</p> <p>In relation to requiring affordable housing from specialist housing scheme, the view taken is that all homes should meet affordable housing obligations where it is viable to do so, even those providing specialist housing for older people and which may fall within a C2 use class. It is not considered that a change to policy is necessary.</p> <p>It is considered that the threshold of the self/custom-build policy is set correctly, especially as the policy is worded so as not to apply if a lack of need for such plots is demonstrated.</p> <p>Self/Custom build is defined in legislation and guidance</p>	

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				<p>the GNLP area, and that the rigid adherence to NDSS is necessary.</p> <p>Accordingly, we would suggest that if this element of the policy is to be retained that , as a minimum requirement, the policy should provide some flexibility to recognise need and viability, where necessary.</p> <p>Whilst the principal of specialist housing is generally supported, clarity is required on what type of specialist housing will be required to provide affordable housing. More specifically, it is not considered that residential and nursing care homes constitute dwellings that generate a requirement for affordable housing provision. In addition, it is considered that the policy should provide a definition as to what is affordable care. Without this information, the policy is not considered to be effective.</p> <p><b>Self &amp; Custom Build</b></p> <p>The provision of self and custom build is recognised. However, the threshold that at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots is not considered to be justified.</p> <p>The threshold would result in the number of self and custom build units provided being substantially in excess of the identified need. As stated at paragraph 282, there are only 113 people on the self and custom build register in the Greater Norwich Area (2018/19). The strategic sites identified on the GNLP i.e. those over 1,000 units, would on their own, deliver substantially more than the identified need.</p> <p>Whilst it is recognised (and welcomed) that the policy includes wording that provision is not required if there is no need, it is suggested that the threshold is reduced to a level which better reflects need. In addition, to provide clarity the policy, or supporting text, should provide further evidence on what is classified as a self / custom build unit. For example, if a developer provides a potential purchaser with a degree of choice in relation to the layout and design of their unit, such as the reconfiguration of layouts to suit individual requirements, or the provision of foundations, pipework to facilitate an extension at a later</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
				date, does this constitute a Custom Build unit for the purposes of the policy?		
Policy 5 Homes	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24103 24123 24236 24268 24280	Object	<p>The GNLP now proposes to deliver 49,492 homes over the period 2018-38 as compared to the need identified in the SHMA for 44,174 homes over the period 2015-36. If this is achieved, this will have beneficial effects on the accessibility of the housing market compared to that assumed in the SHMA such that it would be expected that a lower proportion of households will fall into affordable housing need. As such, the need for 25% affordable housing identified in the SHMA should be treated as a maximum.</p> <p>From Table 6 of the GNLP it can be calculated that there it is proposed that 44,252 homes will be delivered over the period 2020-38. As set out, the available evidence indicates that there is a need for at most 25% of this to be delivered as affordable housing, or at most a need for 11,063 affordable homes.</p> <p>In order to address this it will be necessary to either recalculate the affordable housing needs based on the planned supply and then set affordable housing policies accordingly, or to reduce the affordable housing requirement within Policy 5 to 25%. However, this is not to say that the provision of additional affordable housing requirement in excess of this level should not be supported such as that proposed by Pigeon.</p> <p>Specialist Housing Paragraph 276 of the GNLP identifies a need for 3,857 specialist retirement units in the plan area over the period 2020-38 based on evidence which is not currently publicly available. It is unclear from this paragraph whether the reference to specialist retirement units includes or excludes residential institutions or whether this reflects only the need for supported accommodation such as sheltered housing, assisted living and extra care housing. The necessary evidence will need to be published to justify the identified need and to clarify precisely which forms of accommodation this includes.</p>	<p>The Greater Norwich authorities do not consider that there is a need to cut the affordable housing policy to 25%. The need is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of fewer than 10 homes which cannot be required to provide affordable housing. Consequently, the GNLP has set a 33% affordable housing requirement for the majority of sites, with a 28% requirement in Norwich city centre where development costs are higher.</p> <p>The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>Also, amongst the issues here is the allocation of GNLP0352 in Brundall, which is addressed and in the site assessment work. The allocation of GNLP0352 is not needed to provide specialist housing. Policy 5 will facilitate the delivery of specialist accommodation in sustainable locations; and, allocations for older people's specialist housing was made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston.</p> <p>As to the requirement for at least 20% of homes to meet Building Regulation M4(2) for adaptable homes, this is considered justified given the</p>	No change

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				<p>Even with the allocations proposed, there clearly remains a significant unmet need for retirement homes and/or beds in residential institutions to address the identified need for 3,857 units over the period 2020-38. In order to provide a sound GNLP it will therefore be necessary to identify a sufficient supply of specialist retirement homes to address the needs of the population as set out in Agreement 14 of the NSPF. Such opportunities are provided by the allocation of Land north of Brecklands Road, Brundall.</p> <p><b>Accessible Housing</b> Policy 5 requires proposals for major housing development to provide at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor. This is an optional technical standard which footnote 46 of the NPPF identifies should only be applied where there is a demonstrable need. In order to address this it will either be necessary to demonstrate a need for accessible housing or to delete this part of the Policy.</p> <p><b>Purpose-built Student Accommodation</b> The proposed housing requirement does not reflect the need for student accommodation identified in the UEA Development Framework contrary to paragraph 61 of the NPPF. The inclusion of student accommodation within Policy 5 infers that this will be counted against the housing requirement notwithstanding that the housing requirement excludes the need for student accommodation. Table 6 confirms that this is the case, as the 5,240 completions from 2018-20 includes the 1,026 student bedspaces with an appropriate conversion factor that were delivered in this period. This would be unjustified and ineffective in meeting the needs of households and/or students and therefore unsound. It will therefore be necessary to increase the housing requirement to reflect the needs of students.</p> <p><b>Self/Custom-Build</b> Paragraph 61 of the NPPF requires that the need for self/custom-build housing is assessed and reflected in planning policies. Contrary to the requirement of national policy, no such assessment has been undertaken in the GNLP. As a result, the requirement of Policy 5 that at least 5% of plots</p>	<p>context of an ageing population. The requirement is costed at £1,400 per dwelling within viability appraisal work.</p> <p>The way in which student accommodation is counted in the GNLP is not considered a matter of soundness, especially as a substantial buffer is incorporated into the plan in addition to the housing need figure set by the standard methodology. Also, a rate of 2.5 is used to convert student bedrooms into homes.</p> <p>On the subject of Self/Custom build the GNLP takes a progressive approach prompted by legislation, government guidance, and council register data. The policy is worded so as not to apply if a lack of need for such plots is demonstrated. On the other point about allowing more plots in rural locations at the edges of villages, the GNLP is also sufficiently flexible, as shown by Policy 7.5 for small-scale windfall development.</p>	

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				on proposals of 40 dwellings are provided as self/custom-build plots is not justified. Many households seeking to build their own homes wish to do so on plots in rural areas or villages, and less so in more urbanised locations. Therefore, the approach of Policy 5 to seek such provision on every development of 40 dwellings or more regardless of location is not justified and nor will it be effective in meeting the need for such plots. In order to address the needs with sufficient flexibility, the needs will have to be identified, allocations proposed to respond to these needs and then in addition the provision of such plots will need to be facilitated through Development Management policies.		
Policy 5 Homes	Savills (UK) Ltd (Mr Alistair Ingram, Associate Director) [19686]	24130	Support	Our client supports Policy 5, insofar as it relates to the provision of affordable housing. This requires provision of 33% affordable housing unless where, for brownfield sites, particular circumstances justify the need for a viability assessment at decision making stage. This would allow for an appropriate level of affordable housing to be determined during the planning application process, subject to appropriate evidence by way of a viability assessment. This will ensure that, where viable, sites can still provide an appropriate level of affordable housing and in turn contribute to the overall delivery of new homes, which might not otherwise be the case without such an approach.	Support noted. The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. Nevertheless, the challenges that brownfield sites can present are recognised in the policy.	No change
Policy 5 Homes	Kevin Goodwin [19980]	24150	Object	New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs". Whilst there are broad references in other policies it fails to state that new housing should be sustainable and not constitute isolated homes within the countryside, contrary to the Framework. Modify the plan to include the additional topic references above.	A change to the plan is not necessary. The approach to both the strategic policies and site allocations work will prevent the building of isolated homes in the open countryside.	No change
Policy 5 Homes	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24159	Object	The policy does not accord with national policy and should be amended as follows to ensure it is sound: "10% of all homes being available for affordable home ownership in accordance with NPPF paragraph 64, unless one of the exceptions to this rule contained in the NPPF is met." Nationally Described Space Standards (NDSS) we recommend that the policy is amended to allow flexibility where the grants available for affordable	Policy 5 as drafted makes reference to providing affordable home ownership dwellings and accords with the NPPF, as well as seeking to meet the needs identified in the Strategic Housing Market Assessment (SHMA). Consequently, no policy changes are needed for soundness.  With reference to Nationally Described Space Standards, evidence was gathered from planning application data about the proportion of homes	No change

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				housing delivery would fail to fully fund the costs of delivering larger dwellings. Self/Custom-Build Housing We recommend that the percentage requirement and site size trigger for delivering self-build housing are reviewed to ensure the policy is designed to meet actual needs.	already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area. Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis the Greater Norwich authorities considered Policy 5 to be sound.  On the subject of Self/Custom build the GNLP takes a progressive approach. prompted by legislation, government guidance, and council register data. The policy is worded so as not to apply if a lack of need for such plots is demonstrated. For this reason, the policy is considered sound.	
Policy 5 Homes	Hopkins Homes Limited (Mr Chris Smith, Development Planner) [14202]	24170	Object	Whilst Hopkins Homes understands the Government's desire to promote the development of housing via Self and Custom-Build, it is common knowledge that the vast majority of demand for such housing is upon smaller and individual development sites in predominantly rural locations, rather than as a small portion of a larger development site. To this end, in order for the Plan to be 'Sound', the wording in Paragraph 283 and in the final Paragraph of Policy 5 should be amended to indicate that proposals for self-build dwellings will be encouraged to come forward in sustainable locations and that specific smaller sites in rural locations will be Allocated for this purpose.	Policy 7.5 for small-scale windfall development allows for plots in rural locations at the edges of villages. On the point about need, and whether demand will exist for self/custom-build on large sites, it is considered that the policy is worded with sufficient flexibility. For this reason, the policy is considered sound.	No change
Policy 5 Homes	Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	24179	Object	Affordable housing The wording of Policy 5 identifies that in some circumstances the percentage of affordable housing that a site can deliver is dependent on financial viability. However, it only allows this important material consideration to be applied to brownfield sites. Whilst it is less common for greenfield sites to have abnormal development costs there can be costs associated with infrastructure delivery and made-up land that impact upon the viability of schemes. This is especially the case for sites that are built out to lower densities where there is less flexibility to offset higher development costs against the number of new homes that are delivered. Policy 5 needs to allow the applicant for any site to demonstrate that site specific matters can justify the need for a viability assessment to determine the level of affordable housing that should be delivered. This should not just be limited to	The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis it is not thought that the wording of policy should change to explicitly allow viability testing on greenfield sites. If exceptional circumstances apply on a greenfield site, this will be determined at the planning application stage.  As to the requirement for at least 20% of homes to meet Building Regulation M4(2) for adaptable homes this is considered justified, given the context of an ageing population. Also, the requirement is costed at £1,400 per dwelling within	No change

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				<p>brownfield sites. Without this flexibility Policy 5 has the potential to prevent sites coming forward, contrary to the requirements of paragraph 59 of the NPPF to boost housing supply. The requirements for self-build plots, space standards and part M(2) dwellings also have the potential to further reduce the level of affordable housing sites can viably deliver. As the requirement for self-build plots in particular has not been included in the Viability Appraisal there is no evidence that it will not render sites unviable to develop if there is no flexibility to the percentage of affordable housing.</p> <p>The 2017 SHMA provides the evidence base for the percentage of affordable housing across the Greater Norwich area, which at that time was calculated as 28% across the Local Plan area. However, once the numbers that have already been delivered (detailed in the Greater Norwich Authority Monitoring Report) and those that could potentially be delivered by Policy 5 have been taken into account, there are questions about whether supply would exceed demand. Notwithstanding the fact that the Norwich area will only be required to deliver 28%, with the ability for this to be reduced due to viability issues, the minimum requirement of 'at least' 33% across the rest of the Local Plan area has the potential to far exceed demand based on the number of major developments that are allocated.</p> <p>The percentage of affordable housing required by Policy 5 should be reviewed in light of past provision since the SHMA was produced and the numbers that could potentially be delivered by sites of more than ten units in the Local Plan area. If as a result of this further work the identified need for affordable housing is shown to be exceeded by the requirements of Policy 5 then the percentage of affordable housing for sites outside the Norwich City Centre area should be reduced accordingly. Notwithstanding the above, the wording of Policy 5 should also be amended so that viability considerations can be taken into account for all sites and not just brownfield sites.</p> <p>Space standards Policy 5 requires the provision of minimum space standards for all housing</p>	<p>viability appraisal work, so it is not thought the policy will reduce the supply of homes.</p> <p>On the subject of Self/Custom build the GNLP takes a progressive approach. prompted by legislation, government guidance, and council register data. The policy is worded so as not to apply if a lack of need for such plots is demonstrated.</p> <p>As to viability considerations, the sale of individual plots often commands a premium and could even benefit the viability of some schemes. Also, the intention and wording of the self/custom build policy is clear in allowing plots to be build out as completed homes for sale, in the event of low demand. As to a developer showing there is no need for plots or that they cannot be sold, the matter will be dealt with by development management planners being careful not to adversely affect the delivery of development.</p> <p>More broadly, the approach to self/custom build strikes a balance, to both promote this traditionally under-represented sector of the house-building industry, but also to recognise concerns. On the point about need, and whether demand will exist for self/custom-build on large sites, it is considered that the policy is worded with sufficient flexibility and will be applied pragmatically at the development management stage so that housing delivery is not affected.</p> <p>Furthermore, it is considered that with suitable master-planning and development phasing self/custom-builders can be accommodated alongside traditional house-building companies.</p> <p>Neither is it considered that applying the Nationally Described Space Standards (NDSS) will reduce the supply of new homes. Evidence was gathered from planning application data about the proportion of homes already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area.</p>	

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				<p>development proposals. This approach does not offer any flexibility for decision makers to consider applications for development that does not accord with the space standards but where other material planning considerations carry weight. For example, it may not be possible for the conversion of existing buildings to fully comply with the space standards, especially listed buildings where to accord with the policy the loss of historic fabric and layout may be needed.</p> <p>Policy 5 needs to include the flexibility for developments that cannot comply with the space standards to be approved where other material planning considerations, such as viability and heritage constraints carry weight in the planning balance. The aspiration for new developments to meet space standards is a valid one. However, the blanket requirement of space standards does not allow for site[1]specific considerations to be taken into account and Policy 5 is not justified. The wording of Policy 5 should be amended to allow greater flexibility for other material planning considerations to be taken into account. Please see suggested wording for Policy 5 below: 'Unless other material planning considerations indicate otherwise, all housing development proposals must meet the Government's Nationally Described Space Standard for internal space or any successor.'</p> <p>Self/Custom-Build The Councils will need to consider the robustness of their self-build register as an evidence base and an accurate indicator for demand for self-build plots. This matter was raised in the examination of the Bedford Borough Council Local Plan 2030. Also, In many cases self-built plots can result in inefficiencies in the development of sites with the need for separate construction accesses and site compounds that may need to be in place long after the host development has been built out. They also generate less revenue for developers than finished homes. If plots are subsequently not sold then it is often not economically viable for volume housebuilders to return to a site to build out individual plots. Therefore, a requirement for self-build plots can impact negatively on the financial viability of a development. Accordingly, this matter should have been considered in the Viability Appraisal to demonstrate that requiring 5% of large sites to be self-build plots is justified</p>	<p>Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis the Greater Norwich authorities considered Policy 5 to be sound. In exceptional circumstances, where for example heritage considerations might be in conflict with applying the NDSS this will be for determination at the planning application stage.</p> <p>Neither is there a need to cut the percentage of affordable homes. The need is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of less than 10 homes which cannot be required to provide affordable housing. Consequently, the GNLP has set a 33% affordable housing requirement for the majority of sites, with a 28% requirement in Norwich city centre where development costs are higher.</p>	

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				<p>and will not delay the delivery of new homes in the most sustainable locations.</p> <p>If the only mechanism to demonstrate a lack of need for self-build plots is by marketing them for 12 months then this would delay the delivery of new homes more than if the same land were built out as part of a wider development. Our client has always been of the opinion that the limited numbers of self-builders on the Councils' registers would be best accommodated as windfall sites on the edges of development boundaries as permitted by Policy 7.5. This would both accelerate the holistic delivery of larger sites and deliver plots in locations where self-builders are more likely to want to live. This approach will also deliver plots at a volume and pace that will address the existing and future needs.</p> <p>The Councils should delete the requirement for 5% of homes on sites of 40 or more dwellings to be allocated to self-build or custom housebuilding. Alongside this, Policy 7.5 should be amended to allow self-built plots to be provided as exceptions to the thresholds for development outside development boundaries.</p>		
Policy 5 Homes	Pegasus Group (Mr Robert Barber) [19984]	24184 24187	Object	<p>Policy 5 of the GNLP Draft Strategy sets out a requirement of 33% affordable housing on sites of 10 or more units, even though the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) identifies that there was a need for 39,486 homes, of which 11,030 represents 28% affordable housing. The affordable requirement should be based on up to date evidence and should be subject to detailed viability testing at a range of scenarios. Therefore, this aspect of Policy 5 will need to be amended. In order to address this, it will be necessary to either recalculate the affordable housing needs based on the planned supply and then set affordable housing policies accordingly, or to reduce the affordable housing requirement within Policy 5 to 28%.</p>	<p>Viability evidence prepared for the GNLP shows that across 11 different typologies the affordable housing requirement is achievable, and therefore housing delivery rates should not be impacted by these obligations. The need is evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of fewer than 10 homes which cannot be required to provide affordable housing.</p> <p>The need and supply of affordable homes is ever-changing, but evidence will be kept up to date. A recent update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the 'pipeline' of affordable homes expected from existing committed development sites, and</p>	No change

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					the most up-to-date information will be available to the inspector.	
Policy 5 Homes	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24196 24197	Object	The requirement for 28% affordable housing is based on the conclusions of the SHMA (June 2017) (as explained in para. 58 of the Pre-Submission Plan), which identified (Figure 83) a need for 11,030 affordable homes out of a total requirement of 39,486 homes across the Greater Norwich Area over the 21-year period 2015-36, or 526 (rounded up) affordable homes per year out of a total requirement of 1,881 (rounded up) dpa. The housing proposed in the Pre-Submission Plan is 2,476 dpa, some 32% (595 dpa) higher than the annual average need identified in the SHMA (noting that in terms of identifying housing need the SHMA has been set aside). If a 28% requirement were applied to the full planned provision of 2,476 dpa it would deliver 694 (rounded up) affordable homes per annum. Noting that the requirement won't apply to sites of less than ten dwellings, if 10% of new homes were to be built on sites of less than ten dwellings, 624 (rounded up) affordable homes per annum would still be delivered. If the 33% requirement were applied to 70% of sites, the 28% requirement to 20% of sites, and 10% of sites exempt, 711 (rounded up) affordable homes per annum would be delivered, some 35+% (185 dpa) more than identified as required by the evidence base to the Pre-Submission Plan. The third bullet point in para. 271 provides some justification for the application of a 28% requirement to sites in Norwich City Centre, but neither the policy nor the supporting text, nor the SHMA provide any quantitative justification for the proposed requirement for 33% on other sites. The reference to 'at least' 33% adds further confusion – is this intended to simply require the rounding-up of a calculated percentage or a substantially greater provision, potentially one where every application will be required to be the subject of a viability exercise to determine the maximum level of affordable housing that can be provided? It simply isn't clear. There is no evidence or justification for the proposed 33% requirement as set out in the Pre-Submission Plan; and the reference to 'at least' requires clarification. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy.	The requirement for affordable housing in Policy 5 as drafted is considered sound. The need is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of fewer than 10 homes which cannot be required to provide affordable housing.  The need and supply of affordable homes is ever-changing, but evidence will be kept up to date. A recent update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the 'pipeline' of affordable homes expected from existing committed development sites, and the most up-to-date information will be available to the inspector.	No change
Policy 5 Homes	Cornerstone Planning Ltd (Mr	24288	Object	The published Central Norfolk SHMA, part 2 (chapter 8 of which addresses Housing for Older People) highlights that there is a structural inadequacy in suitable housing	The issues raised here are addressed by the site assessment work, and GNLPO474-0476 continues to be considered unsuitable for inclusion.	No change

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	Alan Presslee, Director) [13498]			<p>for the 'retirement+' market, with demand in 20 years expected to be as much as 5x the current provision. With purpose-designed and serviced housing it has been proven that independent living (providing higher levels of mental health and personal wellbeing) can be extended and supplemented by assisted living, so that nursing and elderly care requirements are contained to end of life. Revised Government policy/Guidance places an increased emphasis on this.</p> <p>The policy and its preamble (Paragraph 275) notes: "An increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist Norfolk County Council's aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing". Barnham Broom Golf &amp; Country Club's proposals for a retirement village associated with the established and growing 'hub' of facilities - to create a diverse and sustainable community - would address and meet such requirements.</p> <p>Acknowledgement in the Plan of the need for a more diverse, flexible and innovative approach to providing specialist 'retirement' housing is necessary to make the Plan sound, together with a specific identification/allocation of the site for specialist housing, in Part 2 of the Plan.</p>	<p>To boost the supply of specialist accommodation for older people Policy 5 states: "<i>Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.</i>" This strategic policy approach should be helpful in encouraging older people's housing in the most sustainable and well-connected locations, such as brownfield redevelopment sites in Norwich.</p> <p>As to specific site allocations, the same approach to the selection of sites was applied for specialist older people's housing as was taken for general residential allocations. Considerations include access to services and public transport, which in some cases could be arguably more important for older people who for reasons of health or increasing frailty may not have access to a private car. Conversely, locating older people's accommodation in separated and isolated locations would be detrimental to creating mixed and cohesive communities.</p> <p>With these points in mind, allocations for older people's specialist housing are made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less sustainably located sites, offering specialist older people's accommodation were not selected for inclusion in the plan. This approach is considered to be sound.</p>	
Policy 5 Homes	Lanpro Services Ltd (Mr Ian Reilly, Senior Associate Planner) [14057]	24298	Object	Increase in housing delivery in Wymondham (Main own) beyond 2026. Deallocation of Policy GNLP0354R: Land at Johnson's Farm, Wymondham Allocation of GNLP4023, North of London Road, Wymondham	<p>The issues raised here are addressed by the site assessment work, and GNLP4023 continues to be considered unsuitable for inclusion.</p> <p>In respect to GNLP0354R, its allocation is justified, and mitigation is set in the policy, including a requirement to safeguard the Conservation Area and listed buildings to the north.</p>	No change
Policy 5 Homes	Strutt & Parker (Adam Davies,	24313	Object	The Plan lacks sufficient site allocations to meet the considerable identified need for older persons' accommodation, which is supported through Policy 5, and	Allocations for older people's specialist housing are made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less	No change

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	Associate Director) [17169]			in particularly in Diss, which is considered one of the most sustainable locations within the Greater Norwich area. As a result, the Plan has not been positively prepared.	sustainably located or unsuitable sites, offering specialist older people's accommodation were not selected for inclusion in the plan. This approach is considered to be sound.	
Policy 5 Homes	Iceni Projects Ltd (Mr James Waterhouse) [20001]	24356	Object	In relation to specialist accommodation, the former Carrow Works site has the potential to include an element of accommodation for older people, and the text of Policy 5 would support this provision. We would also recommend that other types of specialist accommodation are addressed in the policy, in particular purpose-built accommodation for rent (Build-to-Rent/ PRS). The 2017 SHMA indicates that the rate of increase of PRS has been significant in recent years, with 45% growth in Central Norfolk between 2001 and 2011. Accordingly, inclusion of reference to supporting the delivery of PRS/ Build[1]to-Rent development in Policy 5 would ensure sufficient provision is made for different elements of housing need within the market.	Policy 5 as drafted is considered sound and the points made about the former Carrow Works site can be accommodated into the master-planning for the East Norwich Strategic Regeneration Area.	No change
Policy 5 Homes	Bidwells (Mr Darren Cogman, LP Contact) [12857]	24369	Object	<p><b>Affordable Housing</b> To ensure the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.</p> <p><b>Space Standards</b> We would suggest that if this element of the policy is to be retained that, as a minimum requirement, the policy should provide some flexibility to recognise need and viability, where necessary.</p> <p><b>Self and Custom Build.</b></p> <p><b>Self and Custom Build</b> Whilst it is recognised that the policy includes wording that provision is not required if there is no need, it is suggested that the threshold is increased to a level which better reflects need.</p>	<p>The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis it is not thought that the wording of Policy 5 should change to explicitly allow viability testing on greenfield sites. If exceptional circumstances apply on a greenfield site, the need for viability appraisal will be determined at the planning application stage.</p> <p>It is not considered that applying the Nationally Described Space Standards (NDSS) will reduce the supply of new homes. Evidence was gathered from planning application data about the proportion of homes already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area. Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis the Greater Norwich authorities considered Policy 5 to be sound.</p> <p>It is considered that the threshold of the self/custom-build policy is set correctly, especially</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
					as the policy is worded so as not to apply if a lack of need for such plots is demonstrated.	
Policy 5 Homes	Savills (Edward James, Planner) [19668]	24373	Object	We welcome the inclusion of viability text within the policy, however, would request the below amendment on the first bullet point to ensure that the viability testing as referred to within the NPPF is appropriately incorporated into the policy: “affordable housing on-site except where viability assessments or exceptional circumstances justify off site provision”.	The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis it is not thought that the wording of Policy 5 should change to explicitly repeat what is said in national policy about allowing commuted sum contributions to affordable housing.	No change
Policy 5 Homes	Quantum Land (Hannah Leary) [18595]	24376	Object	We welcome the acknowledgement that high costs can have an impact on viability, and the adjustment to this Policy at ‘Affordable Housing, 1st bullet, (b)’ for brownfield sites. However, it is our view that this approach should not be restricted solely to brownfield sites. All sites within the Norwich Urban Area and Fringe will by their urban nature be constrained and will face the same challenges as City centre sites, and it is our view that the same flexible approach should be applied to those sites, with the lower 28% threshold being applied. As acknowledged by the proposed amendment to the Policy, this would need to be supported by viability evidence.	The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis it is not thought that the wording of policy should change to explicitly allow viability testing on greenfield sites. If exceptional circumstances apply on a greenfield site, the need for viability appraisal will be determined at the planning application stage.	No change
Policy 5 Homes	Savills (Lydia Voyias, Associate) [16956]	24384	Object	<p>It is requested the policy is amended to state: “Major residential development proposals will provide 28% affordable housing on-site across the plan area. The Council will negotiate with developers if an accurate viability assessment indicates that this target cannot be met in full.”</p> <p>In terms of the PBSA section of the policy, and the last bullet point of this section, we repeat a request for the following amendment to take account of sites already allocated for PBSA as part of a mixed use allocation and to ensure that double counting on affordable housing is avoided. We therefore suggest the following wording: “Away from UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich’s higher educational institutions and the proposal will: “.....make provision for the delivery of a quantum of affordable housing that would be expected if the site were developed for general needs housing, unless the site has already been allocated for purpose built student accommodation or/and where part of the broader development scheme would deliver market</p>	<p>The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis it is not thought that the wording of policy should change to explicitly allow viability testing on greenfield sites. If exceptional circumstances apply on a greenfield site, to need for a viability appraisal will be determined at the planning application stage.</p> <p>Viability evidence prepared for the GNLP shows that outside the City Centre 33% affordable housing is achievable. Setting the affordable housing policy at 33% is also necessary to reflect that not all sites will be policy compliant in providing affordable homes, such as sites of fewer than 10 homes.</p> <p>As to the policy for purpose-built student housing development, the wording as drafted is considered sound. Losing the opportunity for affordable</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
				housing and associated affordable housing as part of the development. Such provision may be made offsite through a commuted sum as set out in supplementary planning documents”	housing obligations would detrimentally affect other communities in Norwich.	
Policy 5 Homes	Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	24392	Object	<p><b>Affordable Housing</b> The policy should be revised to state that regard will be given to viability considerations at the application stage for both brownfield and greenfield sites.</p> <p><b>Space Standards</b> In the apparent absence of the necessary robust evidence to justify it, the policy should provide some flexibility to recognise need and viability, where necessary.</p> <p><b>Self and Custom Build</b> The threshold should be increased, to better reflect the likely need.</p>	<p>The approach to viability testing accords with planning practice guidance which states that viability analysis at the plan-making stage should make the need for a viability appraisal at the application stage exceptional. On this basis it is not thought that the wording of policy should change to explicitly allow viability testing on greenfield sites. If exceptional circumstances apply on a greenfield site, the need for a viability appraisal will be for determined at the planning application stage.</p> <p>It is not considered that applying the Nationally Described Space Standards (NDSS) will reduce the supply of new homes. Evidence was gathered from planning application data about the proportion of homes already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area. Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis the Greater Norwich authorities considered Policy 5 to be sound.</p> <p>It is considered that the threshold of the self/custom-build policy is set correctly, especially as the policy is worded so as not to apply if a lack of need for such plots is demonstrated.</p>	No change
Policy 5 Homes	Mrs Nicole Wright [14312]	24405	Object	It is considered that to make the plan sound, a significant number of dedicated allocations should be made regarding the provision of elderly accommodation. It is considered that traditional C2 institutions are not the answer, but instead the promotion of ‘care villages’ where semi-independence can be secured for elderly people, with care and welfare available on site as their health deteriorates. Given the substantial need, it is considered that a policy supporting elderly care provision is not sufficient, and that as a strategic priority more dedicated sites should be allocated to provide elderly accommodation.	To boost the supply of specialist accommodation for older people Policy 5 states: “ <i>Development proposals providing specialist housing options for older people’s accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.</i> ” This strategic policy approach should be helpful in encouraging older people’s housing in the most sustainable and well-connected locations, such as brownfield redevelopment sites in Norwich.	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>As to specific site allocations, the same approach to the selection of sites was applied for specialist older people's housing as was taken for general residential allocations. Considerations include access to services and public transport, which in some cases could be arguably more important for older people who for reasons of health or increasing frailty may not have access to a private car. Conversely, locating older people's accommodation in separated and isolated locations would be detrimental to creating mixed and cohesive communities.</p> <p>With these points in mind, allocations for older people's specialist housing are made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less sustainably located sites, offering specialist older people's accommodation were not selected for inclusion in the plan. This approach is considered to be sound.</p>	
Policy 5 Homes	Mr Andrew Cawdron [12806]	24416	Object	Suggested changes are: mention of the December 2020 Government carbon target emissions reduction of at least 68% by 2030; Revise the Reg. 19 draft to align with the Reg. 18 proposals for target housing numbers; justify the job numbers target as realistic; remove the Norwich Western Link from the plan and tighten up the policies and provide targets for the environment and climate change before submission to the Inspector for approval.	<p>The NWL is an infrastructure scheme that would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.</p> <p>its inclusion in the GNLP is sound.</p> <p>On the point about dealing with climate change, the GNLP recognises its utmost importance. 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>	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
					Section 4 of the GNLP deals with addressing climate change. The environmental objective of the GNLP is also clear: "To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050."	
Policy 5 Homes	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24429 24430 24442 24443	Object	<p>Paragraph 276 of the Strategy states that "the policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council strategy identifies the need for 2842 additional extra care units by 2028. County wide evidence has identified the need for 3857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038." Both of these figures differ from the stated 3,909 spaces within C2 institutions that the SHMA is expecting to be used.</p> <p>Taking the above allocations into consideration, they would cumulatively result in the provision of approximately 300 dedicated elderly accommodation units. This is not a sound or appropriate strategy, nor is it positively prepared as the proposed allocations do not meet the areas need, nor does it meet even 25% of the area's identified need. As such, it is considered this approach is not sound in accordance with paragraph 35 of the NPPF.</p> <p>As stated within the Inspectors report when assessing the Vale of Aylesbury Local Plan Policy H6, specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations.</p>	<p>To boost the supply of specialist accommodation for older people Policy 5 states: "<i>Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.</i>" This strategic policy approach should be helpful in encouraging older people's housing in the most sustainable and well-connected locations, such as brownfield redevelopment sites in Norwich.</p> <p>As to specific site allocations, the same approach to the selection of sites was applied for specialist older people's housing as was taken for general residential allocations. Considerations include access to services and public transport, which in some cases could be arguably more important for older people who for reasons of health or increasing frailty may not have access to a private car. Conversely, locating older people's accommodation in separated and isolated locations would be detrimental to creating mixed and cohesive communities.</p> <p>With these points in mind, allocations for older people's specialist housing are made at Barrack Street (Norwich), Colney, Taverham, Aylsham and Harleston. Other, less sustainably located sites, offering specialist older people's accommodation were not selected for inclusion in the plan. This approach is considered to be sound.</p>	No change
Policy 5 Homes	David Lock Associates	24457	Object	At the time of this submission the GNLP evidence base does not include any housing	On the subject of Self/Custom build the GNLP takes a progressive approach. prompted by	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
	(Heather Pugh, Partner) [20014]			needs assessment, or equivalent, nor is there any record of the self-build and custom housebuilding register for the GNLP area to align the 5% requirement with the underlying demand evidence. We suggest that GNLP may wish to rectify this in the period to submission of the plan. Each of the GNLP Authorities are bound by legislation (The Self-build and Custom Housebuilding Act 2015) to keep a registration of the individuals and associations of individuals who are seeking to acquire serviced plots. Therefore, it should be relatively easy to compile the individual registers of the GNLP Authorities to create a composite register for the GNLP area. In tandem, we suggest the Dec 2020 Viability Assessment is amended to take account of the policy 5% requirement for serviced self/custom-housing plots to ensure the ambition is sufficiently assessed prior to the submission of the GNLP and consideration at Examination.	legislation, government guidance, and council register data. The policy is worded so as not to apply if a lack of need for such plots is demonstrated. As to viability considerations the sale of individual plots often commands a premium and could even benefit the viability of some schemes. Also, the intention and wording of the self/custom build policy is clear in allowing plots to be build out as completed homes for sale, in the event of low demand.	
Policy 5 Homes	La Ronde Wright (Alastair Curran, Principal Planning Consultant) [20009]	24480	Object	<p>Speaking from a practical point of view, the attraction of custom and self-build dwellings lies in the flexibility of the design and layout. Given the size of the proposed allocations within the GNLP, it is fair to assume that volume house builders will be delivering the majority of sites, this means in reality that economies of scale will be used to produce standardised dwellings, where bespoke units will appear incongruous. Additionally, logistical complexities of delivering sites with multiple contractors simultaneously will further reduce the attraction for smaller self-builders.</p> <p>To make the policy and plan sound, it is considered that a more flexible policy be proposed. Policies HOU03 and HOU05 of the Breckland Local Plan (see Annex 1) facilitate a more flexible approach that directly responds to the needs of custom/self-builders. These policies recognise the principle aspirations of self-builders and sets a favourable framework for approving self-build dwellings in small villages and hamlets outside of settlement boundaries. This is done by allowing for development in more rural locations and actively encouraging smaller sites, which are more likely to be delivered through a windfall style policy, than tying self-build plots in large housing allocations.</p>	<p>On the subject of Self/Custom build the GNLP takes a progressive approach. prompted by legislation, government guidance, and council register data. The policy is worded so as not to apply if a lack of need for such plots is demonstrated.</p> <p>On the other point about allowing more plots in rural locations at the edges of villages, the GNLP is also sufficiently flexible, as shown by Policy 7.5 for small-scale windfall development. Furthermore, it is considered that with suitable master-planning and development phasing self/custom-builders can be accommodated alongside traditional house-building companies.</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
Policy 5 Homes	Savills (Lydia Voyias, Associate) [16956]	24512	Object	<p><b>Affordable Housing</b> The policy wording does not appear to be robustly justified by the support evidence base. It is stated at paragraph 271 that the supporting Strategic Housing Market Assessment 2017 identifies a need for 11,030 affordable homes across Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point. In addition it is also stated at paragraph 271 that “The most recent viability study findings... conclude... generally able to provide 28% affordable housing”. Whilst it is noted that the Council has updated its Viability Evidence in December 2020 it doesn’t appear to relate to Broadland Village Clusters. In addition I am aware that Broadland Council has been seeking 28% affordable housing in recent S106 agreements based upon the relevant evidence base.</p> <p><b>NDSS</b> The Pre-Submission Plan does not adequately demonstrate that a policy requirement for all new housing residential development comply with the Nationally Described Space Standards (NDSS) is ‘needed’. The fact that some proposals are already providing development which complies with the relevant standards is not sufficient justification.</p>	<p>The requirement for affordable housing in Policy 5 as drafted is considered sound. The need is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of fewer than 10 homes which cannot be required to provide affordable housing.</p> <p>The need and supply of affordable homes is ever-changing, but evidence is kept up to date. An update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the ‘pipeline’ of affordable homes expected from existing committed development sites, and the most up-to-date information will be available to the inspector.</p> <p>With reference to Nationally Described Space Standards, evidence was gathered from planning application data about the proportion of homes already being built in Greater Norwich that comply with the NDSS standards. This showed that 75% of the 245 units sampled met or exceeded the standard for Gross Internal Area. Applying the Nationally Described Space Standards was also costed into Viability Study appraisals. On this basis Policy 5 is considered to be sound.</p>	No change
Policy 5 Homes	Mr Bryan Robinson [14521]	24537	Object	<p>Section 57 of NPPF states that it is up to the applicant to demonstrate whether particular circumstances justify the need for a Viability Assessment and therefore the legality of this Policy needs to be considered.</p> <p>The Affordable Housing Need is stated at paragraph 271 of Reg. 19 v 1.7 as 11,030 between 2015 and 2036 being 28% of the overall housing need as established in the 2017 SHMA Report. The Housing Need has since been recalculated as 40,541 but the number of affordable housing has not been reassessed over the revised timescales. Assuming the affordable housing percentages will apply to the 22% buffer of allocations</p>	<p>The requirement for affordable housing in Policy 5 as drafted is considered sound. The need is indeed evidenced by the Strategic Housing Market Assessment (SHMA). This study shows that over 11,000 affordable homes are required, so overall 28% of the 40,541 homes required by the standard methodology need to be affordable. However, this is not the entire answer, as not all sites will deliver 28% affordable housing. An obvious exception is smaller sites of fewer than 10 homes which cannot be required to provide affordable housing.</p> <p>The need and supply of affordable homes is ever-changing, but evidence is kept up to date. An</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>above the defined overall housing need, basic mathematics determines that the number of affordable housing units will exceed the need by 2,427 if all the sites are developed over the period.</p> <p>The Plan does not indicate the reduced number of affordable homes are already in the system through the reductions in Neighbourhood plans and committed sites with approved lower percentages of affordable housing. All this data should be readily available to the GNDP and the plan should show the numbers of affordable houses which will be provided against this policy for meeting the overall housing need target and how this will be managed in scenarios where the overall need is not being met and if annual completions are nearer to the target including the 22% buffer. Without this study comparing potential extra affordable homes if the buffer is built out and reductions from Neighbourhood plans and lower approved numbers in existing commitments the policy on affordable homes is meaningless.</p>	<p>update to the SHMA shows a similar level of need to the original study completed in 2017. The Greater Norwich authorities are also continuing to monitor the 'pipeline' of affordable homes expected from existing committed development sites, and the most up-to-date information will be available to the inspector.</p>	
Policy 5 Homes	Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]	24545	Object	<p><b>Affordable Housing</b> Gladman supports the element of flexibility within the draft policy allowing viability assessments to be submitted in respect of brownfield sites in particular circumstances. To confirm, the sites which are being promoted by Gladman for inclusion within the plan can all provide a policy compliant level of affordable housing, if not greater for example Poringland offers 36% affordable housing.</p> <p><b>Accessible and Specialist Housing</b> Gladman is supportive of this policy approach as the provision of specialist housing to meet the needs of older people is of increasing importance. Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care).</p> <p><b>Self/Custom Build</b></p>	<p>The issues raised here are addressed by the site assessment work, and GNLP4023 continues to be considered unsuitable for inclusion.</p> <p>On the subject of Self/Custom build the GNLP takes a progressive approach. prompted by legislation, government guidance, and council register data. The policy is worded so as not to apply if a lack of need for such plots is demonstrated. On the other point about allowing more plots in rural locations at the edges of villages, the GNLP is also sufficiently flexible, as shown by Policy 7.5 for small-scale windfall development. Furthermore, it is considered that with suitable master-planning and development phasing self/custom-builders can be accommodated alongside traditional house-building companies.</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>Gladman objects to the inclusion of a fixed percentage requirement in relation to the provision of serviced self-build plots. Gladman believes that those wishing to bring forward a self-build or custom build house are unlikely to wish to do this alongside a large-scale housing development. Consequently, rather than including a strict requirement for this provision Gladman would recommend the policy encourages the consideration of the provision of self-build plots in locations where the demand exists. Any specific requirement to include self[1]build plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk. Gladman notes that the proposed policy does include a mechanism which allows developers the opportunity after 12 months to either continue to market the plots for self-build or to revert back to them being delivered as part of the wider market housing scheme. Gladman supports the inclusion of this policy mechanism as it is necessary to ensure that housing land is not unnecessarily prevented from being brought forward.</p>		

**Policy 6 – The Economy (including Retail)**

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 6	Mrs Georgina Brotherton - Horsham Properties Ltd [19554]	23407	Support	Policy wording provides sufficient flexibility to allow small scale employment sites to expand.	Support welcomed	No change
Policy 6	RJ Baker & Sons [19063]	23489	Support	Support the allocation of land at Browick Interchange, Wymondham as a strategic employment location	Support welcomed	No change
Policy 6	Pigeon Investment Management Ltd [13863]	24104 24237	Object	Plan does not provide a mechanism to provide for non former B-class jobs including in infrastructure supporting housing	Non former B-Class jobs, including housing related infrastructure, are provided for including through expansion of existing facilities, on employment sites, in town centres and, where appropriate on housing sites.	No change
Policy 6	Pigeon Investment Management Ltd [13863]	24124	Object	Need to allocate a mixed use site that would include land for business relocation in Reepham.	See site specific response to GNLP0353R	No change
Policy 6	Breckland District Council [19646]	24229	Object	The Council is concerned about the cumulative impact of growth in the Cambridge Norwich Tech Corridor on infrastructure particularly power, and also on water supply and transport.	The Key Strategic Employment Areas, including those in locations that could affect Breckland District Council area, have all been agreed through the Norfolk Strategic Planning Framework. The authorities will work together, including through the CNTC partnership to overcome any joint constraints to implementation.	No change
Policy 6	Lanpro Services Ltd [12984]	24284	Object	Need to allocate GNLP3047 employment land at Keswick to provide an extension to an undeveloped allocation.	Evidence demonstrates no need for additional allocations. See site specific response to GNLP3047.	No change
Policy 6	Sirius Planning [15640]	24304	Object	The policy should allow for small scale employment development within the countryside, outside settlement boundaries. This should include key infrastructure such as petrol filling stations. A site at the junction of the A140/B1134 is promoted	Policy 6 provides support for new rural businesses in particular through paragraphs 2, 4 and 5 and the section on town centres (which includes smaller local centres).	No change
Policy 6	Mrs Nicole Wright [14312]	24387	Support	The policy encourages small scale retail and leisure developments serving local needs, new residential developments and existing residential areas, promoting active travel. It appears to be sound.	Support welcomed	No change
Policy 6	CODE Development Planners Ltd [12557]	24390	Object	Policy is unsound and not legally compliant because it does not allocate a site suitable for the relocation of Ben Burgess Ltd. A site at Swainsthorpe is promoted. The submission assesses that no other allocations are suitable for this business.	The Plan allocates more than sufficient land to accommodate normal quantitative and qualitative needs including for the scale and type of business proposed. It is not appropriate to allocate a relatively remote rural site to meet the constrained business model of a single business.	No change
Policy 6	Mrs Nicole Wright [14312]	24406	Object	Policy should allow for the diversification or replacement with other uses, such as new assets that serve local communities, of businesses that face an uncertain future.	Such proposals are covered by development management policies and changes of use under the use classes order.	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
				Spowston Sports and Social Club is given as an example.	A blanket approach would undermine the retention of business opportunities to support local needs in urban and rural areas.	
Policy 6	La Ronde Wright [20009]	24431 24440	Object	Need to allocate more land and more smaller sites to increase choice and flexibility, support new creative industries and promote diversity.  Racecourse Community Park is promoted as an additional allocation.	There are a wide range of employment sites across the area and no evidence of any need for additional allocations	No change
Policy 6	La Ronde Wright [20009]	24449	Object	Not enough support for new rural businesses. Policy needs to be more flexible. Rural locations are appropriate for new creative industries.  If the policy is not more flexible allocations should be made at for example Ashby St Mary and Thurston, between Norwich Road and Mill Road as part of a 4 hectare allocation.	Policy 6 provides support for new rural businesses in particular through paragraphs 2, 4 and 5 and the section on town centres (which includes smaller local centres).	No change
Policy 6	David Lock Associates [20014]	24458	Object	Policy 6 fails to capitalise on the opportunity to further support and direct employment growth to the Cambridge-Norwich Tech Corridor.  Silfield Garden Village proposal includes employment land that is attractive to the market and in line with the CNTC vision.  Need to add specific reference in Policy 6 supporting the objective and ambitions of the CNTC and to encourage and support opportunities for development and economic growth consistent with these ambitions.	The Plan places significant emphasis on the CNTC. The CNTC is more than the A11 corridor. Most of the Plan's growth supports the CNTC being concentrated in the Strategic Growth Area identified on the Key Diagram. Key economic assets supporting the CNTC include Norwich and its city centre, the Norwich Research Park (including UEA and the Norfolk and Norwich University Hospital (NNUH)), the Food Enterprise Park, Norwich Airport, Browick Road (Wymondham) and Hethel Engineering Centre.	No change
Policy 6	Natural England [13804]	24463	Support	Welcome the recognition given under (5) of Policy 6 to protect, enhance and expand the Green Infrastructure network	Support welcomed.	No change
Policy 6	Gladman Developments [19996]	24546	Object	The plan should better recognise the role of housing in supporting and growing the economy, including in the CNTC, and delivering higher levels of growth as in the City Deal.	The Plan recognises the economic role of housing by providing for significantly more housing growth than required to address local housing need. The Plan supports the CNTC by concentrating the majority of growth in the Strategic Growth Area identified on the Key Diagram.	No change

## Policy 7 – Strategy for the areas of growth

### 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
300	Abzag Ltd [19528]	23828	Object	Soundness objection raised to the non allocation of site GNLP0514. The site assessment is flawed and that questions the whole soundness of the site selection process. Site is incorrectly classified as 'unreasonable' when all rational identifies it as sustainable. Comments regarding accessibility to services and facilities, landscape, trees and flood risk.	The site selection process is considered to be sound. This site is not considered suitable to accommodate the minimum allocation threshold of 12 dwellings as it includes a small area of flood risk, is in the river valley landscape designation and adjacent to a County Wildlife site. The site does not have a safe pedestrian route to the catchment primary school in Little Melton, there are alternative primary schools in Bowthorpe but these are still some distance away.	No change
300	Arthur Rope [19796]	23284	Object	Objections raised on legal compliance, soundness and duty to cooperate grounds regarding the fact that Aylsham Town Council were not consulted on the 83% increase since Regulation 18. This increase in housing is excessive for Aylsham with its infrastructure problems. Site GNLP0596 should be removed or at the very least deferred. The GNLP appears to be aiming for 49,492 new dwellings when the government formula only requires 40,500 so there is capacity for the removal of some excess provision.	Planning Regulations anticipate that there will be changes after Regulation 18 consultation. 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 a further regulation 18 consultation. The site which has been added in Aylsham was consulted on as a 'reasonable alternative site at Reg 18C.	No change
301	Trevor Bennett [14599]	23385	Support	This is the way to increase the number of new homes and give opportunity for self-build.	Support noted	No change
301	Robert Gower [19504]	23947	Object	Soundness objection raised.  Propose correction from 'during the plan period' to 'from adoption of the plan' for consistency with paragraph 389 and Appendix 7.  Amend wording to add '...of up to 3 to 5 dwellings per parish OR MORE WHERE JUSTIFIED' in accordance with representation to Policy 1.	The GNLP authorities accept that a minor modification could be made to change the text at paragraph 301 from 'during the plan period' to 'from adoption of the plan' to be consistent with paragraph 389 and Appendix 7  The change to add 'or more where justified' is not accepted as the 3 or 5 dwelling threshold has been set and agreed.	Minor modification to amend the text at paragraph 301 as suggested to be consistent with paragraph 389 and Appendix 7  No further changes needed
303	Trevor Bennett [14599]	23383	Object	Objections raised on legal compliance, soundness and duty to cooperate grounds.  The fact that this is a strategy for 3 councils working together it would be expected that it would be finished in all 3 areas. The fact that South Norfolk has no allocations in the village clusters makes this at best unsound if not legally compliant. All increased numbers in Reg 19 from Reg 18 should be withdrawn until there has been both consultation and South Norfolk has drawn up its village cluster allocations.	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 has to accord with the strategic policies in the GNLP including the minimum number of dwellings to be provided.	No change

**Policy 7.1 – The Norwich urban area including the fringe parishes**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Paragraph 304	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24533	Object	The GNLP should include a policy for taller buildings and the skyline. Current approach (some mentions within policies and intention to produce 3D model of City to inform subsequent DM policy review) is considered insufficient.  Recommended scope of study provided in rep.	The existing development management policies and conservation area appraisals (and any subsequent revisions) including the city centre conservation area appraisal sufficiently cover the considerations required for applications for tall buildings. Norwich City Council is considering creating a 3D model of the city for use in assessment. It is important to note that height is not an isolated issue and that proposals need to be looked at holistically.	No change

**The City Centre**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Paragraph 312	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23971	Support	We welcome the reference at bullet point two to conserving and enhancing the historic and natural environment.	Support noted.	No change

**The Northern City Centre**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Paragraph 316 (refers to all aspects of Northern City Centre supporting text paras 316 to 332)	pal-planning ltd (Mr Peter Luder, Director) [19950]	23827	Object	Agent on behalf of Developer.  Policy 7.1 The Northern City Centre: the text would benefit from a number of amendments / corrections / additions to better set its context and the regeneration objectives, to align with Policy GNLP0506.  Clarification is also needed that the objective to preserve office accommodation within the city centre, potentially via an Article 4 Direction in respect of permitted development changes of use to residential, would not apply to the Policy GNLP0506 Land at and adjoining Anglia Square site, where redevelopment of redundant office buildings for residential use is welcomed.	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. However, it should be noted that the area under the flyover referenced in this representation has not been submitted for consideration as a site allocation, as such has not been consulted on throughout the GNLP process.	No change  If the Inspector is minded to make a change to the supporting text, as a Proposed Modification, then the GN authorities have no objection to this

				Suggested changes to paragraphs 316, 317, 320, 322, 324.		
Paragraph 316	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23972	Object	<p>Historic England recognise that this area contains a number of key brownfield sites and understand the importance of regeneration in the area for the city as a whole.</p> <p>We note the amendments made to the Anglia Square site allocation policy and also to policy 7.1 to reference some of the key principles for development in this area. However, we continue to have some significant concerns regarding the approach to development at Anglia Square and the lack of HIA evidence to inform the allocation. Furthermore, detailed comments are provided in relation to policy 7.1 and site allocation policy GNLP0506</p>	Regard has been had to heritage issues as part of the strategic policy writing process. Further heritage statement has been undertaken for the site at Anglia Square GNLP0506 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.	No change.

### East 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
Paragraph 333	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	24532	Object	<p>We recognise the opportunities provided in East Norwich for brownfield regeneration. Concerns regarding Carrow Works (Abbey/Priory) set out in response to site allocation policy.</p> <p>Question capacity of the East Norwich sites.</p> <p>Suggest detailed HIA is required to appropriately inform development / allocation potential including any necessary mitigation or enhancements that could be made.</p>	<p>The East Norwich Strategic Regeneration Area is subject to a comprehensive master planning process which has commenced and is ongoing. This work will cover heritage impacts and capacity of the site in more detail.</p> <p>Regard has been had to heritage issues as part of the strategic policy writing process. Further heritage statement has been undertaken for the sites in East Norwich 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.</p>	No change
Paragraph 335	Sport England (Mr Philip Raiswell, Planning Manager) [13516]	23605	Support	Sport England sees East Norwich as an opportunity to improve social infrastructure and design a site that meets Sport England's active design principles	Support noted	No change
Map 9	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23344	Support	Map 9 needs to show the part of the utilities site in The Broads. The preceding text talks about looking at the area as a whole, yet misses the bit of the Utilities Site that is in the Broads.	Support noted. The mapping prepared for the GNLP covers allocations made within this plan; it does not seek to detail allocations in other planning authority areas. The area of the Utilities Site outside of this plan area have therefore not been shown. 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	<p>No change.</p> <p>If the Inspector is minded to make a change to Map 9, as a Main Modification, then the GN authorities have no objection to this.</p>

					such a change is proposed it is considered that it should be made clear that this site area lies outside of the GNLP boundary and is shown for reference only.	
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**Elsewhere in the urban area, including the fringe parishes**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Paragraph 340	Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	24230	Object	Concerns over impact of cumulative growth. Studies in evidence base have failed to consider the cumulative growth from GNLP & Breckland plans.	<p>Breckland and Greater Norwich LPAs have supported coordinated growth in the Cambridge Norwich Tech Corridor through various initiatives. The issues the cumulative impact of growth on power and water supplies have been considered and are being addressed on an ongoing basis with the utilities providers (UK Power Networks and Anglian Water (AW)).</p> <p>This is being done through cooperative work which both Breckland and Greater Norwich are engaged in, including through the NSPF and the Cambridge Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of the utilities companies. AW is planning for water transfers from Greater Norwich to Breckland.</p> <p>The councils will work together, as per the Statement of Common Ground, with the utilities providers to ensure that water and power needs are met and on co-operative work on new settlements.</p>	No change

**Policy 7.1 – The Norwich Urban Area including the fringe parishes**

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 7.1	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23345	Support	There needs to be some acknowledgement in this policy, even if it is a footnote, to say that part of the Utilities site is in the Broads and that the entire area is being considered together, regardless of local planning authority administration boundaries	<p>Support noted.</p> <p>The GNLP strategic policy covers allocations made within this plan; it does not seek to detail allocations in other local authority areas. The area of the Utilities Site outside of this plan area has therefore not been referenced in this policy. 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. If such a change is proposed it is considered that it should be made</p>	No change. If the Inspector is minded to make a change to include a footnote reference to the Broads Authority allocation for the Utilities Site as a Main 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
					clear that this site area lies outside of the GNLP boundary and is noted for reference only.	
Policy 7.1	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23351	Support	Paragraph 5 'The Built, Natural and Historic Environment', bullet 3; suggested addition of a footnote to the Broads local plan policies on navigation.	Support noted. The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested to refer to the Broads Local Plan policies on navigation. However, the GNLP authorities would not object to a proposed modification being put forward by the Inspector.	No change. If the Inspector is minded to make a change to include a footnote reference to the Broads Authority local plan policies on navigation, as a Main Modification, then the GN authorities have no objection to this.
Policy 7.1	Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	23355	Support	Missing full stop in 'East Norwich' text. Should be after ' <i>economic benefits</i> ' and before ' <i>Development</i> '  Missing comma in second bullet point of the second set of bullet points in the East Norwich element of the policy. Should be after 'housing needs' and before ' <i>the provision</i> '.	The GNLP authorities accept that a minor modification could be made to correct the error/factual changes summarised in the previous column.	Minor modifications corrections to policy 7.1 of the plan:  Add full stop after ' <i>benefits</i> ' and preceding ' <i>Development</i> ' in fourth line of policy text under East Norwich heading: ...optimising economic benefits. Development across the sites...  Add comma after ' <i>needs</i> ' and preceding ' <i>the</i> ' in second line of second bullet of second set of bullets in policy text under East Norwich heading: ...that meet housing needs, the provision of area-wide economic...
Policy 7.1	Brown & Co (Miss Emma Griffiths, Planner) [19847]	23405	Object	The GNLP is over reliant sites within the urban area, particularly in the urban fringe. Only 22% of proposed allocations in the fringe parishes are for fewer than 50 dwellings.  Large sites often have slow delivery rates, smaller sites should be allocated to enable faster delivery whilst a smaller amount of larger allocations are progressed.	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. Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.	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>Numerous allocations (75%) have been carried forward from previous local plans which have a track record of not delivering.</p> <p>This strategy is ineffective; which places the strategy for growth at risk and undermines the Plan led approach. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period, with a number of sites having no promoter or developer on board.</p>		
Policy 7.1	Mrs Janet Skidmore [19326]	23506	Object	<p>The contingency site at Costessey is likely to be ineffective at addressing housing delivery; additional contingency sites should have been identified.</p> <p>There are a number of constraints and actions required at this site prior to it delivering housing meaning it is unlikely to make a meaningful contribution to housing supply to address low housing delivery rates.</p> <p>Multiple contingency sites should have been identified in a variety of locations, the trigger mechanism should be activated earlier than three years.</p>	<p>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>The trigger mechanism of 15% and three years are intended to be consistent with the Housing delivery test which is over three years.</p>	No change
Policy 7.1	SERRUYS PROPERTY COMPANY LIMITED [19895]	23518	Object	<p>(relating to East Norwich Strategic Regeneration area) Support changes made since regulation 18C, particularly relating to housing density and flexibility to Affordable Housing. Amendment of boundary to include all land with extant permissions welcomed.</p> <p>The regeneration 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. We therefore propose that Policy 7.1 is amended to set out a clear benefit a development can provide, such as 10% biodiversity net gain. (Refer to representation to Policy 3).</p>	<p>Support to changes made since reg 18C noted.</p> <p>ENSRA is a key strategic allocation, its inclusion in the plan does not preclude development. Biodiversity net gain is included in policy 3 and therefore it is not necessary to repeat the requirement in this policy. Direct benefits of the ENSRA development are to be explored as part of the master planning process.</p>	No change
Policy 7.1	Sport England (Mr Philip Raiswell, Planning Manager) [13516]	23606	Support	Sport England supports the proposed growth agenda, but would wish to see a commitment to on-site opportunities for sport and physical activity within the Growth Triangle	<p>Support noted.</p> <p>No changes are required for soundness. Allocations within the Growth Triangle are existing allocations in an adopted Area Action Plan as such are commitment in the GNLP. The policies are not superseded.</p>	No change
Policy 7.1	Taylor Wimpey [19920]	23629	Support	Support for the proposed strategy for the Norwich Urban Area as the main focus for growth the key location for existing and planned employment growth and is a sustainable location in terms of accessibility by walking,	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
				cycling and public transport. Proposed allocation GNL0172 at Rackheath will contribute towards the housing target.  No modifications required.		
Policy 7.1	The Theatres Trust (Mr Tom Clarke, Planner) [12590]	23822	Support	Welcomes support for cultural facilities.  Part 3 of Policy 7.1 should be amended to include protection of valued facilities in accordance with paragraph 92 of the NPPF	Support noted.  Policy 7.1 supports the City centre's leisure, cultural and entertainment offer, including expansion. The GNL0 does not seek to make allocations for existing uses. There is no evidence to support the requirement for additional protection outside of the existing Use Class Order and GPDO.	No change
Policy 7.1	Savills (UK) Ltd (Matthew Sobic, Director) [19966]	23916	Object	Policy 7.1 is restrictive and not in accordance with NPPF and the revised Use Class Order. A greater degree of flexibility is essential to enable vibrancy and viability of town centres. In store retail is declining exacerbated by the pandemic; leisure uses should not be restricted to a defined leisure area omitting 'Chantry Place' (previously known as Intu Chapelfield).  Policy 7.1 does not provide a flexible approach to enable City Centres to grow and diversify to enable them to respond to rapid changes in commercial property markets.	Policy 7.1 seeks to promote vitality and vibrancy in the City Centre. A sequential test is proposed for leisure uses outside the defined leisure area – as such this does not preclude development.	No change
Policy <a href="#">7.1</a>	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23973	Object	Concerns relating to Housing figures (continued concern since Reg 18C) HIA required to test and inform the capacity of sites; these have not been done. This calls into question the accuracy of the capacity of some of the sites.  Clarification of numbers attributed to Northern City Centre regeneration area would be useful.  Difficult to say whether doubling of housing figures at East Norwich from 2,000 to 4,000 is realistic without HIA evidence.  We find the Plan unsound as it is not justified since it is not based on sufficient evidence in relation to the historic environment.  High densities on brownfield sites may be possible to achieve but it would not be appropriate the densities associated with very tall buildings in metropolitan areas.	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. Housing figures for Northern City Centre regeneration area relate to the report produced by the Secretary of State determining the called in application.  ENSRA The masterplan process will examine how barriers to development can be addressed to deliver exemplar development across the East Norwich Regeneration Areas and as part of this heritage and the historic environment will be considered. . It should be reiterated that the masterplan is not starting from housing numbers – instead it is about understanding the site constraints and being guided by these.	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 7.1	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23974	Object	<p>The wording of the first sentence is very generic and should be more locationally specific to Norwich,</p> <p>Bullet point two should be amended and re-ordered – suggested wording provided in representation with added emphasis to <i>'Heritage Impact Assessments and the Taller Buildings and the Skyline Study'</i>. (Representation mentions rewording bullet point 2, however the content of the suggested re-wording appears to relate to bullet point 3 of this section)</p> <p>Deletion of bullet point relating to landmark buildings in earlier draft welcomed.</p> <p>East Norwich: Concern regarding doubling of housing figure from 2,000 to 4,000. Question whether this is realistic, suggest HIA.</p> <p>Elsewhere in the urban Area: There is currently no reference to the need to conserve and enhance the historic environment within the list of bullet points for these areas. Amend the Plan to include a bullet point in relation to the historic environment.</p>	The GN Authorities consider that the existing development management policies and conservation area appraisals (and any subsequent revisions) including the city centre conservation area appraisal sufficiently cover the considerations required for applications for tall buildings. Norwich City Council is considering creating a 3D model of the city for use in assessment. It is important to note that height is not an isolated issue and that proposals need to be looked at holistically. 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.	<p>No change</p> <p>Re bullet point 2 - If the Inspector is minded to make a change to this bullet point, as a Main Modification, then the GN authorities have no objection to this, with a slight amendment to that proposed: <i>"New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), in particular in relation to scale, mass, height, layout and design. New development will be sustainable and, where appropriate, innovative design.</i></p> <p>Re Elsewhere in the urban area: If the Inspector is minded to make a change to this to include a bullet point referencing the need to conserve the historic environment, as a Main Modification, then the GN authorities have no objection to this,</p>
Policy 7.1	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24058	Object	The methodology used in the preparation of the plan and assessment of Reasonable Alternative sites has failed to be justified by proportionate and consistent evidence as required by paragraph 35 of the National Planning Policy Framework	The site assessment process is clearly laid out in the site assessment booklets for all areas of the hierarchy. This is informed by evidence and the Sustainability Appraisal.	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>Not legally compliant The approach taken in the assessment of sites and referred to in various site assessment booklets does not represent a transparent, objective or evidence based approach. The GNDP has failed to properly comply with its legal obligation to assess the Reasonable Alternatives on a comparative basis, having regard to a transparent and objective evidence, as is required by The Strategic Environmental Appraisal Directive 2001. (reference Legal Opinion at Appendix 1 of separate attached representation document).</p> <p>Change suggested by respondent: The GNDP should prepare proportionate evidence, properly informed by a Sustainability Appraisal and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNLP0332R and GNLP0334R as either allocated sites or contingency sites.</p>		
Policy 7.1	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24059	Object	<p>Not effective A plan preparation uninformed by the anticipated rate of development for specific sites and instead based on an average of past delivery rates on different sites with entirely different issues at a different time with different economic and social circumstances is likely to be unsound and is certainly not transparent and tested for its ability to deliver sufficient houses within the plan period. In our view, this is particularly important where a plan such the GNLP seeks to supply a large number of homes on large scale development formats. As stated in paragraph 72 of the Framework, in identifying large scale development, authorities should "make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites...."</p> <p>Change suggested by respondent: In view of the concerns and to ensure that the plan is effective and sound under this test we recommend that: a) evidence should be produced to define, explain and allow proper testing of the anticipated delivery rates of all committed and allocated sites. This would be in accordance with advice contained in paragraph 72 of the Framework.</p>	<p>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>The deliverability of these sites is agreed in statements of common ground with site promoters and developers. The housing trajectory uses this information and additional information from the 5 year land supply to set out informed estimates of when developments will be delivered throughout the plan period. There is confidence that there will be a five year land supply upon adoption.</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>b) Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. This would be in accordance with advice contained in paragraph 68 of the Framework which confirms how small and medium sized sites can make an important contribution to meeting the housing requirement of an area.</p> <p>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.</p> <p>d) Alternatively, other contingency sites should be identified to replace the Costessey contingency site referred to in Policy GNLP0581/2043. The site is not considered to be justified and suitable for development and, in any event, is unlikely to be delivered quickly given the substantial necessary and in some cases uncertain improvements and mitigation</p>		
Policy 7.1	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24064	Object	<p>Unsound - Not justified The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337, identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R.</p> <p>We recommend that:</p> <p>a) proportionate evidence, properly informed by Sustainability Appraisal should be prepared and consulted on either to demonstrate the suitability of the proposed allocation sites and contingency site in comparison with other Reasonable Alternative sites or to demonstrate the suitability of sites GNLP0332R and GNLP0334R as either allocated sites or contingency sites.</p> <p>b) Subject to evidence and consultation, the GNLP could elect to allocate or identify both sites GNLP0332R and GNLP0334R for development or contingency, as alternatives to presently allocated or identified</p>	<p>The site assessment process is clearly laid out in the site assessment booklets for all areas of the hierarchy. This is informed by evidence and the Sustainability Appraisal.</p> <p>The sites selected are considered to be the most appropriate, deliverable sites for sustainable development to meet the housing need of the 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
				contingency sites or as additional allocated or contingency sites.		
Policy 7.1	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24070	Object	<p>Disproportionate and unsustainable supply of housing in GNLP is in the Norwich Urban Area.</p> <p>This is unlikely to be developable due to market saturation in a single settlement.</p> <p>The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay hinged around the Anglia Square allocation.</p> <p>East Norwich Strategic Regeneration Area is a long term prospect with a high level of constraints and a history of un-delivery, the available evidence does not suggest that the sites will come forward as described.</p> <p>Other new allocations. Figures attributed to Colney do not account for conversion ratio due to extra care bed spaces. No live applications or consents to demonstrate deliverable supply.</p> <p>Housing figures for Taverham appear to be over calculated by 5, no current applications or consents to demonstrate deliverable supply.</p> <p>It is therefore clear that even based on the insufficient evidence that is available, the supply identified in Policy 7.1 has been over-stated and that in reality the developable supply will be lower.</p> <p>The details of the extensive commitment have not been set out in the evidence base contrary to paragraph 67 of the NPPF, and no assessment of their developability appears to have been undertaken. Reliance upon these is not justified and may not be effective.</p> <p>It is therefore evident that not only is the urban-focus of the GNLP unsustainable on its own terms, jeopardising the vitality of rural communities contrary to paragraph 78 of the NPPF and increasing the need to travel contrary to paragraph 103 of the NPPF, it is also unlikely to be achievable including because of the market saturation that arises from focusing development in one location, the reliance upon as yet unidentified funding streams, the</p>	<p>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>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</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>dependency upon future SPDs, the absence of any progress towards delivery to date and the absence of any evidence that the identified sources of supply are developable. To compound matters it is also apparent from the limited evidence available that the identified supply has been erroneously over-inflated as described previously.</p> <p>Recommendation: In order to accord with national policy, support rural communities, reduce the need to travel, and provide for an achievable GNLP, it will be necessary to revisit the distribution of development. It will also be necessary to address the identified errors and to itemise the sources of supply in accordance with national policy and provide the appropriate evidence to demonstrate that these are developable including for example providing trajectories, assessing the viability of those sites with particular constraints, and providing evidence that the promoters are committed to delivery.</p> <p>Contingency Site: Greater Norwich has a record of under delivery meaning the GNLP supply will need to be increased substantially to circa 53,207 homes.</p> <p>Contingency site in the urban fringe compounds the issues of soundness identified above, urban area is already saturated. In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery.</p> <p>Recommendation: In the first instance the necessary evidence in support of the developable supply should be published as required by national policy to accurately determine the developable supply. It will then be necessary to establish the amount of additional housing that will be required to meet the housing need in the GNLP and to provide sufficient confidence that this will actually be met which could be of the order of 53,207 homes across the plan area. An appropriate monitoring framework should then also be introduced to trigger an</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
				immediate focussed review of the GNLP if any shortfall arises.		
Policy 7.1	Bidwells (Mr Iain Hill, Partner) [16273]	24085	Support	<p>Submitted by Bidwells on behalf of Scott Properties: The proposed Settlement Hierarchy and the identification of Norwich and the Urban Fringe as the location to accommodate 66% of the housing growth during the period to 2038 is strongly supported.</p> <p>This approach is entirely consistent with paragraph 72 of the NPPF, which advises that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities.”</p>	Support noted	No change
Policy 7.1	Mr Magnus Magnusson [14502]	24089	Object	<p>The plan is unsound due to the failure to allocate site reference GNLP4014 (land east of Fir Covert Road, Taverham).</p> <p>The site is demonstrably 'suitable' as evidenced by the HELAA (Taverham &amp; Ringland 'booklet', p.37 - Stage 2 HELAA Comparison table). Furthermore, this site is available, achievable and deliverable (and viable). The site can (potentially) accommodate both residential and/or economic development</p>	The process of site selection is set out in the assessment booklet for Taverham and Ringland which concludes that sites GNLP0337R and GNLP0159R are the most suitable sites for allocation. Site GNLP4014 continues to be unreasonable 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. Officers from Development Management, Highways, the Lead Local Flood Authority and Children’s Services were involved in the site assessment process.	No change
Policy 7.1	Bidwells (Mr Iain Hill, Partner) [16273]	24094	Support	<p>Submitted by Bidwells on behalf of Abel Homes</p> <p>The proposed Settlement Hierarchy and the identification of Norwich and the Urban Fringe as the location to accommodate 66% of the housing growth during the period to 2038 is strongly supported.</p> <p>This approach is entirely consistent with paragraph 72 of the NPPF, which advises that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities.”</p>	Support noted	No change
Policy 7.1	Pigeon Investment Management Ltd	24105	Object	Disproportionate and unsustainable supply of housing in GNLP is in the Norwich Urban Area.	The overall housing numbers are set to ensure that the housing need for Greater Norwich identified by	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 Rob Snowling, Associate Director) [13863]			<p>This is unlikely to be developable due to market saturation in a single settlement.</p> <p>The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay hinged around the Anglia Square allocation.</p> <p>East Norwich Strategic Regeneration Area is a long term prospect with a high level of constraints and a history of undelivery, the available evidence does not suggest that the sites will come forward as described.</p> <p>Other new allocations. Figures attributed to Colney do not account for conversion ratio due to extra care bed spaces. No live applications or consents to demonstrate deliverable supply.</p> <p>Housing figures for Taverham appear to be over calculated by 5, no current applications or consents to demonstrate deliverable supply.</p> <p>It is therefore clear that even based on the insufficient evidence that is available, the supply identified in Policy 7.1 has been over-stated and that in reality the developable supply will be lower.</p> <p>The details of the extensive commitment have not been set out in the evidence base contrary to paragraph 67 of the NPPF and no assessment of their developability appears to have been undertaken. Reliance upon these is not justified and may not be effective.</p> <p>It is therefore evident that not only is the urban-focus of the GNLP unsustainable on its own terms, jeopardising the vitality of rural communities contrary to paragraph 78 of the NPPF and increasing the need to travel contrary to paragraph 103 of the NPPF, it is also unlikely to be achievable including because of the market saturation that arises from focusing development in one location, the reliance upon as yet unidentified funding streams, the dependency upon future SPDs, the absence of any progress towards delivery to date and the absence of any evidence that the identified sources of supply are developable. To compound matters it is also apparent from the limited evidence available that the identified</p>	<p>using the government's methodology will be met, including a buffer to ensure delivery.</p> <p>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</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>supply has been erroneously over-inflated as described previously.</p> <p>Recommendation: In order to accord with national policy, support rural communities, reduce the need to travel, and provide for an achievable GNLP, it will be necessary to revisit the distribution of development. It will also be necessary to address the identified errors and to itemise the sources of supply in accordance with national policy and provide the appropriate evidence to demonstrate that these are developable including for example providing trajectories, assessing the viability of those sites with particular constraints, and providing evidence that the promoters are committed to delivery.</p> <p>Contingency Site: Greater Norwich has a record of under delivery meaning the GNLP supply will need to be increased substantially to circa 53,207 homes.</p> <p>Contingency site in the urban fringe compounds the issues of soundness identified above, urban area is already saturated. In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery.</p> <p>Recommendation: In the first instance the necessary evidence in support of the developable supply should be published as required by national policy to accurately determine the developable supply. It will then be necessary to establish the amount of additional housing that will be required to meet the housing need in the GNLP and to provide sufficient confidence that this will actually be met which could be of the order of 53,207 homes across the plan area. An appropriate monitoring framework should then also be introduced to trigger an immediate focussed review of the GNLP if any shortfall arises.</p>		
Policy 7.1	Woods Hardwick Planning Ltd	24115	Object	The regulation 19 plan has disproportionately increased the percentage of development in the plan towards the	The overall housing numbers are set to ensure that the housing need for Greater Norwich identified by	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
	(Paul Woods) [19974]			<p>Norwich Urban Area at the expense of the Village Clusters.</p> <p>It is important that the increase in allocations is distributed more evenly across the hierarchy to ensure diversity, choice and competition in the market for land and to safeguard the delivery of the increased new allocations overall. Such an approach will also allow continued support for local services and community facilities in the village clusters and in doing so will ensure support for thriving rural communities.</p> <p>The plan is unsound when considered against criteria b) to d) of paragraph 35 of the NPPF as follows:  b) the Plan is not justified in so much that it doesn't provide an appropriate strategy for the provision and distribution of housing growth;  c) the Plan is not effective in that there is a currently a risk that the required housing need will not be delivered over the plan period; and  d) the Plan is not consistent with national policy in that there is a risk that it will not deliver sustainable development to meet required housing need in accordance with the policies of the Framework.</p>	<p>using the government's methodology will be met, including a buffer to ensure delivery.</p> <p>The strategy focuses the majority of development in the most accessible locations in the urban area, towns and larger villages, with an appropriate amount of growth in village clusters to support service retention and provide opportunities to access housing locally.</p> <p>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</p>	
Policy 7.1	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24125	Object	<p>Disproportionate and unsustainable supply of housing in GNLP is in the Norwich Urban Area.</p> <p>This is unlikely to be developable due to market saturation in a single settlement.</p> <p>The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay hinged around the Anglia Square allocation.</p> <p>East Norwich Strategic Regeneration Area is a long term prospect with a high level of constraints and a history of undelivery, the available evidence does not suggest that the sites will come forward as described.</p> <p>Other new allocations.  Figures attributed to Colney do not account for conversion ratio due to extra care bed spaces. No live applications or consents to demonstrate deliverable supply.</p>	<p>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>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</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>Housing figures for Taverham appear to be over calculated by 5, no current applications or consents to demonstrate deliverable supply.</p> <p>It is therefore clear that even based on the insufficient evidence that is available, the supply identified in Policy 7.1 has been over-stated and that in reality the developable supply will be lower.</p> <p>The details of the extensive commitment have not been set out in the evidence base contrary to paragraph 67 of the NPPF, and no assessment of their developability appears to have been undertaken. Reliance upon these is not justified and may not be effective.</p> <p>It is therefore evident that not only is the urban-focus of the GNLP unsustainable on its own terms, jeopardising the vitality of rural communities contrary to paragraph 78 of the NPPF and increasing the need to travel contrary to paragraph 103 of the NPPF, it is also unlikely to be achievable including because of the market saturation that arises from focusing development in one location, the reliance upon as yet unidentified funding streams, the dependency upon future SPDs, the absence of any progress towards delivery to date and the absence of any evidence that the identified sources of supply are developable. To compound matters it is also apparent from the limited evidence available that the identified supply has been erroneously over-inflated as described previously.</p> <p>Recommendation: In order to accord with national policy, support rural communities, reduce the need to travel, and provide for an achievable GNLP, it will be necessary to revisit the distribution of development. It will also be necessary to address the identified errors and to itemise the sources of supply in accordance with national policy and provide the appropriate evidence to demonstrate that these are developable including for example providing trajectories, assessing the viability of those sites with particular constraints, and providing evidence that the promoters are committed to delivery.</p> <p>Contingency Site: Greater Norwich has a record of under delivery meaning the GNLP supply will need to be increased</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>substantially to circa 53,207 homes.</p> <p>Contingency site in the urban fringe compounds the issues of soundness identified above, urban area is already saturated. In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery.</p> <p>Recommendation: In the first instance the necessary evidence in support of the developable supply should be published as required by national policy to accurately determine the developable supply. It will then be necessary to establish the amount of additional housing that will be required to meet the housing need in the GNLP and to provide sufficient confidence that this will actually be met which could be of the order of 53,207 homes across the plan area. An appropriate monitoring framework should then also be introduced to trigger an immediate focussed review of the GNLP if any shortfall arises.</p>		
Policy 7.1	Honingham Parish Council (Ms Jordana Wheeler, Clerk) [14400]	24167	Object	<p>This response addresses significant flaws in the classification of Honingham as being part of the urban fringe, linked to Easton, under Policy 7.1, and the proposal of a Garden Village at Honingham Thorpe under Policy 7.6.</p> <p>Insufficient account has been taken of the dramatic change and decrease in the retail offering in Norwich, which provides for a significant redevelopment from retail to housing. These changes are very likely to provide a significant increase in housing development, thereby reducing the need for “garden villages” in Norfolk.</p> <p>Policy 7.1 links the village of Honingham with Easton, which is designated as urban fringe. Honingham is, however, a rural village with a long history and certainly not urban fringe. Hence it is erroneous and damaging to link the village with Easton and consider the impact of massive development in this context. Arguably, this is deliberately misleading and seeks to provide justification for the plans.</p>	<p>The GNLP does not allocate any housing development sites in Honingham. Under policy 7.5 the maximum number of additional dwellings from small scale additional windfall from the adoption of the plan will be five in Honingham parish. The food enterprise park near Easton and Honingham benefits from existing planning consent.</p> <p>Policy 7.6 identifies the potential for new settlements to assist in meeting growth needs in future plans. While it is accepted that retail change may provide some additional housing, it is unlikely to provide significant numbers of new homes to meet needs.</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
				Honingham does not have the infrastructure capacity for new development.		
Policy <a href="#">7.1</a>	Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	24180	Object	<p>Wording of policy 1 and site allocations state 'minimum' or 'approximate' housing numbers. Policy 7.1 states 'totals'.</p> <p>Policy 7.1 should be amended so that all the figures for the allocations are identified as minimums. Additional text should be added to confirm that developments will be required to make effective use of land with the final number of homes delivered on individual allocations being based on a design-led approach.</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 include the word 'minimum' in the heading of the fourth column of the housing table to read 'Total <i>minimum</i> deliverable housing commitment 2018-2038.	No Change  If the Inspector is minded to make a change as a main modification, inserting "minimum" to the heading of the fourth column of the housing table as a Proposed Modification, then the GN authorities have no objection to this.
Policy 7.1	Pegasus Group (Mr Robert Barber) [19984]	24188	Object	<p>Our Client considers that the Draft Local Plan in its current form is legally compliant, complies with the Duty to Cooperate and is legally sound. Nevertheless, certain Draft Strategy Policies (namely 1, 5 and 7.1) would benefit from amendments to provide greater certainty for the plan period (2018-2038).</p> <p>Evidence has been submitted to put forward the case that the currently unallocated site at Dairy Farm (ref: GNLP4030) can be deliverable in the first 5 years of the plan. It is considered that the allocation of additional sustainable sites, which are available and deliverable, like Land at Dairy Farm, is required to provide greater security over the plan period.</p>	<p>The representation considers site GNLP430 to be an urban fringe site. The parish of Great and Little Plumstead into which this site falls is not included in the fringe parishes of the GNLP therefore the assessment has been carried out for the site as part of the Great and Little Plumstead village cluster.</p> <p>The process of site selection is set out in the assessment booklet for Great and Little Plumstead which concludes that no sites are suitable for allocation. Sites promoted have been rejected for allocation primarily because of highway concerns and the absence of a safe pedestrian route to school in some cases. This site is not proposed for allocation as there is currently no need for that scale of development in that location within the green protection zone of the AAP</p> <p>Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.</p>	No change
Policy 7.1	Pigeon Investment Management Ltd (Mr Rob Snowling,	24238	Object	<p>Disproportionate and unsustainable supply of housing in GNLP is in the Norwich Urban Area.</p> <p>This is unlikely to be developable due to market saturation in a single settlement.</p>	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.	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
	Associate Director) [13863]			<p>The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay hinged around the Anglia Square allocation.</p> <p>East Norwich Strategic Regeneration Area is a long term prospect with a high level of constraints and a history of undelivery, the available evidence does not suggest that the sites will come forward as described.</p> <p>Other new allocations. Figures attributed to Colney do not account for conversion ratio due to extra care bed spaces. No live applications or consents to demonstrate deliverable supply.</p> <p>Housing figures for Taverham appear to be over calculated by 5, no current applications or consents to demonstrate deliverable supply.</p> <p>It is therefore clear that even based on the insufficient evidence that is available, the supply identified in Policy 7.1 has been over-stated and that in reality the developable supply will be lower.</p> <p>The details of the extensive commitment have not been set out in the evidence base contrary to paragraph 67 of the NPPF and no assessment of their developability appears to have been undertaken. Reliance upon these is not justified and may not be effective.</p> <p>It is therefore evident that not only is the urban-focus of the GNLP unsustainable on its own terms, jeopardising the vitality of rural communities contrary to paragraph 78 of the NPPF and increasing the need to travel contrary to paragraph 103 of the NPPF, it is also unlikely to be achievable including because of the market saturation that arises from focusing development in one location, the reliance upon as yet unidentified funding streams, the dependency upon future SPDs, the absence of any progress towards delivery to date and the absence of any evidence that the identified sources of supply are developable. To compound matters it is also apparent from the limited evidence available that the identified supply has been erroneously over-inflated as described previously.</p>	Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.	

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>Recommendation: In order to accord with national policy, support rural communities, reduce the need to travel, and provide for an achievable GNLP, it will be necessary to revisit the distribution of development. It will also be necessary to address the identified errors and to itemise the sources of supply in accordance with national policy and provide the appropriate evidence to demonstrate that these are developable including for example providing trajectories, assessing the viability of those sites with particular constraints, and providing evidence that the promoters are committed to delivery.</p> <p>Contingency Site: Greater Norwich has a record of under delivery meaning the GNLP supply will need to be increased substantially to circa 53,207 homes.</p> <p>Contingency site in the urban fringe compounds the issues of soundness identified above, urban area is already saturated. In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery.</p> <p>Recommendation: In the first instance the necessary evidence in support of the developable supply should be published as required by national policy to accurately determine the developable supply. It will then be necessary to establish the amount of additional housing that will be required to meet the housing need in the GNLP and to provide sufficient confidence that this will actually be met which could be of the order of 53,207 homes across the plan area. An appropriate monitoring framework should then also be introduced to trigger an immediate focussed review of the GNLP if any shortfall arises.</p>		
Policy 7.1	Strutt & Parker (Charlotte Ellum, Technical Assistant / Secretary) [19989]	24242	Object	<p>Objection to the plan's failure to identify site GNLP0442 as a specific new allocation.</p> <p>Objection to listing the site as 'not allocated', this is misleading as it does not recognise its status as an existing commitment (extant planning consent). To</p>	The policy map in the site allocations document associated with Thorpe St Andrew shows only proposed allocations (of which there are none); it does not state 'not allocated' for any sites. The site assessment booklet for Thorpe Saint Andrew contains a map on page 27 which shows both 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
				<p>identify such sites on the Local Plan Map as “Not Allocated” leads to uncertainty, confusion and is clearly at odds with the certainty that the plan led system is expected to deliver.</p> <p>The lack of new allocations in Thorpe St Andrew is inconsistent with the tests of soundness. This site could deliver in the first 5 years of the plan.</p> <p>It appears that for some reason the choice has been made to only include allocations which are brought forward from earlier versions of the Plan, including sites which have not necessarily come forward, even though planning permission has been granted. It would seem a questionable strategy to rely on such sites, rather than sites which have recently gained permission and are considered to be deliverable. This approach and failure to formally recognise and allocate commitments which contribute to the plan’s delivery strategy, is unjustified and ineffective, making the plan not sound.</p> <p>This strategy for Thorpe St Andrew does not seem to be consistent with other settlements where previous allocations and sites with planning permission have been included as allocations.</p> <p>Inconsistency in figures presented for Thorpe St Andrew in assessment booklet &amp; policy 7.1</p>	<p>existing commitment through consent as a yellow hatched area. Sites submitted for consideration for allocation, of which there are five are shown on the map. The grey shading in the legend/key denotes ‘not allocated’. It is considered that providing further subgroups would over complicate the maps making them too busy to read legibly. It is considered to be sufficiently clear where existing commitments are located, along with their reference and where sites considered for allocation are, along with their reference. The reason for allocation/not allocation are described earlier in the assessment booklets. The Regulation 19 interactive consultation map loads with sites automatically shown (there are 13 sub-categories of sites within this layer), it is possible to turn on the layer which also shows existing commitment.</p> <p>The numbers for Thorpe St Andrew (386) shown in policy 7.1 are correct.</p> <p>The process of site selection is set out in the assessment booklet for Thorpe St Andrew which concludes that no new sites are proposed to be allocated. As a commitment for 300 homes, the Racecourse Plantation site is already counted in the GNLP housing figures against meeting the housing need in the plan area. It is understood that the site is deliverable, evidence submitted to the five-year land supply and included in the housing trajectory expects delivery to commence within the first five years of the plan and complete by 2025/26. The site benefits from an extant consent with extensive discussion of its constraints and how these can be mitigated provided by the planning inspectors report. As such the principle of development is established for this site with its unique provision of a community woodland park. New allocations throughout the plan area are primarily on unconsented sites. A revision of settlement limits has not been carried out as part of the GNLP process, as such Thorpe St Andrew has not been treated differently in this respect.</p>	
Policy 7.1	Pigeon Investment	24269	Object	Disproportionate and unsustainable supply of housing in GNLP is in the Norwich Urban Area.	The overall housing numbers are set to ensure that the housing need for Greater Norwich identified by	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
	Management Ltd (Mr Rob Snowling, Associate Director) [13863]			<p>This is unlikely to be developable due to market saturation in a single settlement.</p> <p>The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay hinged around the Anglia Square allocation.</p> <p>East Norwich Strategic Regeneration Area is a long term prospect with a high level of constraints and a history of undelivery, the available evidence does not suggest that the sites will come forward as described.</p> <p>Other new allocations. Figures attributed to Colney do not account for conversion ratio due to extra care bed spaces. No live applications or consents to demonstrate deliverable supply.</p> <p>Housing figures for Taverham appear to be over calculated by 5, no current applications or consents to demonstrate deliverable supply.</p> <p>It is therefore clear that even based on the insufficient evidence that is available, the supply identified in Policy 7.1 has been over-stated and that in reality the developable supply will be lower.</p> <p>The details of the extensive commitment have not been set out in the evidence base contrary to paragraph 67 of the NPPF and no assessment of their developability appears to have been undertaken. Reliance upon these is not justified and may not be effective.</p> <p>It is therefore evident that not only is the urban-focus of the GNLP unsustainable on its own terms, jeopardising the vitality of rural communities contrary to paragraph 78 of the NPPF and increasing the need to travel contrary to paragraph 103 of the NPPF, it is also unlikely to be achievable including because of the market saturation that arises from focusing development in one location, the reliance upon as yet unidentified funding streams, the dependency upon future SPDs, the absence of any progress towards delivery to date and the absence of any evidence that the identified sources of supply are developable. To compound matters it is also apparent</p>	<p>using the government's methodology will be met, including a buffer to ensure delivery.</p> <p>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</p>	

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				<p>from the limited evidence available that the identified supply has been erroneously over-inflated as described previously.</p> <p>Recommendation: In order to accord with national policy, support rural communities, reduce the need to travel, and provide for an achievable GNLP, it will be necessary to revisit the distribution of development. It will also be necessary to address the identified errors and to itemise the sources of supply in accordance with national policy and provide the appropriate evidence to demonstrate that these are developable including for example providing trajectories, assessing the viability of those sites with particular constraints, and providing evidence that the promoters are committed to delivery.</p> <p>Contingency Site: Greater Norwich has a record of under delivery meaning the GNLP supply will need to be increased substantially to circa 53,207 homes.</p> <p>Contingency site in the urban fringe compounds the issues of soundness identified above, urban area is already saturated. In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery.</p> <p>Recommendation: In the first instance the necessary evidence in support of the developable supply should be published as required by national policy to accurately determine the developable supply. It will then be necessary to establish the amount of additional housing that will be required to meet the housing need in the GNLP and to provide sufficient confidence that this will actually be met which could be of the order of 53,207 homes across the plan area. An appropriate monitoring framework should then also be introduced to trigger an immediate focussed review of the GNLP if any shortfall arises.</p>		
Policy 7.1	Pigeon Investment	24281	Object	Disproportionate and unsustainable supply of housing in GNLP is in the Norwich Urban Area.	The overall housing numbers are set to ensure that the housing need for Greater Norwich identified by	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
	Management Ltd (Mr Rob Snowling, Associate Director) [13863]			<p>This is unlikely to be developable due to market saturation in a single settlement.</p> <p>The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay hinged around the Anglia Square allocation.</p> <p>East Norwich Strategic Regeneration Area is a long term prospect with a high level of constraints and a history of undelivery, the available evidence does not suggest that the sites will come forward as described.</p> <p>Other new allocations. Figures attributed to Colney do not account for conversion ratio due to extra care bed spaces. No live applications or consents to demonstrate deliverable supply.</p> <p>Housing figures for Taverham appear to be over calculated by 5, no current applications or consents to demonstrate deliverable supply.</p> <p>It is therefore clear that even based on the insufficient evidence that is available, the supply identified in Policy 7.1 has been over-stated and that in reality the developable supply will be lower.</p> <p>The details of the extensive commitment have not been set out in the evidence base contrary to paragraph 67 of the NPPF and no assessment of their developability appears to have been undertaken. Reliance upon these is not justified and may not be effective.</p> <p>It is therefore evident that not only is the urban-focus of the GNLP unsustainable on its own terms, jeopardising the vitality of rural communities contrary to paragraph 78 of the NPPF and increasing the need to travel contrary to paragraph 103 of the NPPF, it is also unlikely to be achievable including because of the market saturation that arises from focusing development in one location, the reliance upon as yet unidentified funding streams, the dependency upon future SPDs, the absence of any progress towards delivery to date and the absence of any evidence that the identified sources of supply are developable. To compound matters it is also apparent</p>	<p>using the government's methodology will be met, including a buffer to ensure delivery.</p> <p>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</p>	

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				<p>from the limited evidence available that the identified supply has been erroneously over-inflated as described previously.</p> <p>Recommendation: In order to accord with national policy, support rural communities, reduce the need to travel, and provide for an achievable GNLP, it will be necessary to revisit the distribution of development. It will also be necessary to address the identified errors and to itemise the sources of supply in accordance with national policy and provide the appropriate evidence to demonstrate that these are developable including for example providing trajectories, assessing the viability of those sites with particular constraints, and providing evidence that the promoters are committed to delivery.</p> <p>Contingency Site: Greater Norwich has a record of under delivery meaning the GNLP supply will need to be increased substantially to circa 53,207 homes.</p> <p>Contingency site in the urban fringe compounds the issues of soundness identified above, urban area is already saturated. In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery.</p> <p>Recommendation: In the first instance the necessary evidence in support of the developable supply should be published as required by national policy to accurately determine the developable supply. It will then be necessary to establish the amount of additional housing that will be required to meet the housing need in the GNLP and to provide sufficient confidence that this will actually be met which could be of the order of 53,207 homes across the plan area. An appropriate monitoring framework should then also be introduced to trigger an immediate focussed review of the GNLP if any shortfall arises.</p>		
Policy 7.1	Gladman Developments	24291	Object	Deliverability concerns regarding the quantum of development directed to Norwich, including a large	The overall housing numbers are set to ensure that the housing need for Greater Norwich identified by	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 Richard Naylor, Senior Land Planner) [19996]			<p>proportion expected to be delivered on existing commitments and allocations.</p> <p>Over reliance on Growth Triangle for delivery within plan period. Concerns over market saturation and market interest from developers.</p> <p>East Norwich Strategic Regeneration Area requires sufficient evidence to demonstrate that the capacity for the area has the ability to accommodate 4,000 homes. Realistic timeframes have to be considered when projecting completions from such sites, Gladman consider that there could be significant delays to delivery on this site.</p> <p>Covid-19 has changed home buyers' priorities with a recent Savills survey finding that 71% of younger buyers crave more outdoor space and rural locations. With this in mind Gladman would also question whether the demand exists for 4,000 dwellings in this location</p>	<p>using the government's methodology will be met, including a buffer to ensure delivery.</p> <p>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</p> <p>Work towards an ENSRA comprehensive master plan has commenced and is ongoing.</p> <p>Norwich urban area is the most sustainable location within the hierarchy for development and the proposed development at East Norwich will seek to maximise the development potential of brownfield land.</p>	
Policy 7.1	Bidwells (Mr Darren Cogman, LP Contact) [12857]	24306	Object	<p>Site GNLP2176 – Land north of Dereham Road Honingham was proposed as a preferred allocation at regulation 18C; however it was dropped from the regulation 19 draft plan. The reason given for not allocating is based upon diversion of existing school bus routes.</p> <p>The regulation 19 draft plan includes allocations in less sustainable locations with similar constraints relating to access to services (inconsistent approach).</p> <p>There is no clear or justified rationale for this change in stance, save for what would appear to be the quantum of objections (principally public) to the Reg.18(C) consultation itself. Any issues raised as reasons for deallocating the site can be addressed.</p> <p>There are inconsistencies within the GNLP's Site Assessment Process Methodology, and the Sustainability Appraisal to the clear disadvantage of the Honingham site.</p> <p>Evidence submitted to support the allocation of this site along with suggested updated wording to the reg 18C version of the draft policy.</p>	<p>The process of site selection is set out in the assessment booklet for Easton and Honingham which concludes that no new sites are proposed to be allocated in Easton &amp; Honingham. Site GNLP2176 was the preferred site for allocation at Regulation 18C in this location, however this was with constraints referenced in the site assessment.</p> <p>Following public consultation it was determined that the scale of site suitable for development would not be sufficient to overcome constraints and was also subject to substantial objections from the local community. The site was not required to meet the housing requirement for the plan. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process. Any planning permissions granted since 2018 are counted as windfall in addition to allocated sites</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
Policy 7.1	Iceni Projects Ltd (Mr James Waterhouse) [20001]	24355	Object	<p>Strongly support the identification of East Norwich as a key opportunity to create a new sustainable urban quarter for Norwich.</p> <p>Carrow Works forms an important element of the wider site allocation. The landowners and other partners in the East Norwich Partnership are progressing the area-wide masterplanning exercise to address the key planning issues and coordinate growth across the different sites.</p> <p>In terms of the specific policy wording, we recommend it is clarified in the policy text that the figures provided in the table identifying the number of new homes and jobs allocated for each site are approximate. This is confirmed in the East Norwich section of the policy, which indicates that the area is allocated for “in the region of” 4,000 additional homes and “around” 6,000 jobs, however for clarity we consider that the table above should also indicate that the figures identified are approximate, and subject to further masterplanning work and assessment. This flexibility is important to ensure development makes efficient use of this sustainable site, and is not unduly constrained by the figures identified at this stage.</p>	<p>Support for East Norwich noted.</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 include the word ‘minimum’ in the heading of the fourth column of the housing table to read ‘Total <i>minimum</i> deliverable housing commitment 2018-2038.</p>	<p>No Change</p> <p>If the Inspector is minded to make a change as a main modification, inserting “minimum” to the heading of the fourth column of the housing table as a Proposed Modification, then the GN authorities have no objection to this.</p>
Policy 7.1	Savills (Edward James, Planner) [19668]	24374	Object	<p>During the previous regulation 18C consultation support was given to bullet point three of the city centre policy relating to cultural and leisure facilities. It is welcomed that this point is retained in the regulation 19 draft of the plan.</p> <p>During the previous regulation 18C consultation support was given to bullet point five of the city centre policy relating to new landmark buildings at the gateways to the city centre. This point has been removed from the regulation 19 draft of the plan. We disagree that a landmark reference should not be included within the policy.</p> <p>Whilst we consider that our site can include a landmark building and much work has already gone into the development of this with the Council. In terms of the wider City Centre we consider that well-designed landmark buildings should be encouraged and this approach is in line with the principle of the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important places.</p>	<p>Other responses received to the Regulation 18C consultation raised the inclusion of landmark buildings within the policy as a cause for concern as it was considered that this could be simply misconstrued as tall resulting in inappropriate poorly designed development.</p> <p>The bullet point was removed, and the second bullet point was expanded to cover aspects of innovative and sustainable design appropriate to location.</p>	<p>No change.</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 7.1	Quantum Land (Hannah Leary) [18595]	24377	Object	<p>Object to policy 7.1 as there are no new allocations within the Thorpe St Andrews Area.</p> <p>Sites GNLP2170 and GNLP2171 are promoted for development in this location, but have not been selected for allocation in the regulation 19 draft plan. There is no evidence to support the development of these sites as resulting in a loss of playing pitches, and the presence of Ancient Woodland is not considered to be a barrier to their development, rather an asset to be managed and protected within a redevelopment scheme.</p> <p>Stage 7 of the site assessment both GNLP2170 and GNLP2171 were dismissed on highways and ecological/landscape grounds, despite there being no objections from Officers on those grounds. This exclusion of the sites from being identified as being preferred sites and therefore becoming site allocations does not reflect the conclusions of the earlier stages of assessment, and on those grounds, we object to the exclusion of these two sites from the Site Allocations</p>	<p>The process of site selection is set out in the assessment booklet for Thorpe St Andrew which concludes that no new sites are proposed to be allocated. These sites were not required to meet the housing requirement for the plan, there is already substantial existing commitment in this parish. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.</p>	No change
Policy 7.1	Mrs Nicole Wright [14312]	24388	Support	<p>The policy states among other things, that elsewhere in the fringe parishes a range of sites will be provided for different types of employment and community uses and promote walking and cycling. This policy appears to be sound.</p> <p>However, the plan is not effective without allocations of smaller employment sites in key locations to address the impact of housing growth.</p> <p>Site GNLP3024 is a key allocation to be provided at Sprowston. The Plan would be unsound without it.</p> <p>A review of the settlement boundary of the town is necessary as it is incorrect as shown on the map regarding Sprowston.</p>	<p>The process of site selection is set out in the assessment booklet for Non Residential Urban Fringe sites which concludes that site although considered a reasonable alternative site for allocation, there is insufficient evidence about the need for the proposal and how the development will come forward. Officers from Development Management, Highways, the Lead Local Flood Authority and Children's Services were involved in the site assessment process.</p> <p>Small employment sites to complement existing larger allocations have been allocated in the Regulation 19 draft plan, however this site is not included in that list.</p> <p>The settlement boundary for Sprowston is shown correctly in mapping. 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</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
					settlement boundaries could be made through neighbourhood plans or a future review of local plan documents.	
Policy 7.1	Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	24391	Support	Support for policy approach to the Norwich Urban Area	Support noted	No change
Policy 7.1	David Lock Associates (Heather Pugh, Partner) [20014]	24459	Object	<p>Whilst we wholly support the focus on Norwich as the regional centre for growth, regeneration and brownfield redevelopment, we are conscious that almost half the housing growth and the majority of the strategic employment areas are located in this area. This undoubtedly poses a risk to the overall deliverability and soundness of the Plan. Not just delivering development, but also not shifting from status quo to a more sustainable net zero carbon form of development.</p> <p>Existing allocations being progressed have a reliance upon public sector funding &amp; public sector intervention to remedy market failure.</p> <p>Rather than allocating contingency sites (such as that at Costessey) which being strategic in nature but located in 'edge of settlement' areas, perpetuate a continuation of ever-increasing and less sustainable patterns/modes of travel back to key centres, the GNDP could be more proactive in creating a resilient plan by putting in place a supportive policy framework to favourably consider a new settlement allocation during the first part of the plan period</p>	<p>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>Evidence to demonstrate deliverability of the allocated sites in the plan is presented in the statements of common ground agreed with site owners; and in the housing trajectory which uses this evidence to demonstrate when housing will be delivered through the plan period.</p> <p>Norwich urban area is the most sustainable location within the hierarchy for development. This plan identifies enough sustainable sites and locations within and on the edge of existing settlements to meet current needs. Consequently, no new settlement is proposed for allocation in this Local Plan. However, with sustainable options for settlement extensions diminishing policy 7.6 of the plan sets out a timetable of work to evidence, assess and appraise the potential for one or more new settlements in the next local plan.</p>	No change
Policy 7.1	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24464	Support	Under the East Norwich heading in the policy, we welcome the reference to protecting and enhancing green infrastructure (GI) assets, corridors and open spaces within the area. We also support the references to the delivery of GI under the section headed Elsewhere in the urban area including the fringe parishes.	Support noted	No change

**Policy 7.2 – The Main Towns**

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 346	Mr Trevor Bennett [14599] Ms Rosamund Weatherall [19905]	23537 23553	Object	<p>An increase in Aylsham of 83% in new homes from Reg.18 to Reg.19 is unsound. The increase of new homes in Aylsham is a higher percentage than that for Norwich or the overall percentage for the main towns. Reg.19 should be withdrawn to enable full consultation with local parish councils and town councils.</p> <p>The original and agreed plan for Aylsham was for 300 homes on one site, even though the infrastructure of Aylsham is already at breaking point. Return to the original plan for 300 homes. Aylsham has already accommodated 550 houses in the last 2 years, There is desperate need for schools, sixth form, doctors, nurseries, care homes, parking, more buses, water supply and sewerage, even before these extra homes are built!</p>	The overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage. 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.
Para 350	Aylsham Town Council (Ms Sue Lake, Clerk) [13265] Mr Jeremy Barlett [19588] Mr Trevor Bennett [14599] Mr Francis Dodd [19811] Mrs Grizelda Tyler [19779] Ms Rosamund Weatherall [19905]	23388 23475 23494 23554 23654 23750	Object	<p>Reg 19 describes the uniqueness of the town highlighting its history and the importance of retaining this. This has been a severe problem with the recent developments of 550 new homes at Willow Park and Bure Meadows, to add a further 300 as in Reg 18 would strain this considerably. However, to increase the number of new homes by a further 83% on the edge of the town indicates that Reg 19 could not have been positively prepared as the evidence points to significant damage to the uniqueness of the medieval town. Change suggested: withdraw the plan to allow full consultation.</p> <p>Aylsham cannot cope with the 550 houses imposed by the latest proposal. It is an illegal decision and is doing yet more to ruin the character of the town. It is lazy planning, an easy option without addressing the fundamental issues created by continual development in the town. The allocation of these extra houses should be spread around the smaller villages - supporting the rural economy.</p>	<p>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>In respect to consultation, the site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage. 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.
Para 351	Mr Jeremy Barlett [19588] Mr Trevor Bennett [14599]	23389 23638	Object	Future development takes away green space, it increases the carbon footprint and the amount of traffic in the area, without considering the increased strain on education and medical services. This is therefore not a sound policy.	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	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
				It is unclear how "development could support further improvements" to the Bure Valley and the Marriott's Way, given that these are of fixed width and route. Any increase in population in areas next to these routes is likely to increase their usage. Marriot's Way is already busy and an increase in users will just add to the congestion.	government's methodology will be met, including a buffer to ensure delivery.  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.	
Para 352	Aylsham Town Council (Ms Sue Lake, Clerk) [13265] Mr Trevor Bennett [14599] Mr Francis Dodd [19811] Mr John Hill [15088] Mr Arthur Rope [19796] Mr Richard Preston [19055] Ms Rosamund Weatherall [19905]	23285 23473 23493 23555 23655 23751 23768	Object	The primary schools in Aylsham are full and there is a lack of urgency regarding building a school. This is not a third school but a replacement school so the increase in pupil numbers will not be vast. This policy requires strengthening to ensure Norfolk County Council act before the developers.  I find it strange that it is thought that 550 new homes, will lead to the "continued vitality of Aylsham." The reality is that the 15% to 20% increase in population with 15.6% increase in new homes will create significant problems for a town that so recently has had a similar increase with little improvements in the infrastructure. The points on strategy for Aylsham indicate a lack of knowledge of the town as well as lack of consultation.	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.  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. Hence the phrase "continued vitality of Aylsham" is used.	No change.
Para 353	Aylsham Town Council (Ms Sue Lake, Clerk) [13265] Mr Trevor Bennett [14599] Mr Francis Dodd [19811]	23390 23556 23656 23753	1 Support 3 Object	It is stated that Anglian Water have 'plans' to increase capacity. Where are the guarantees? Where are the time scales? Any future development should not be approved until this work has been completed. The suggested change is to insist on the work coming before the development.	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.  Anglian Water has a statutory duty to provide water supplies and wastewater infrastructure for their customers. Also, Anglian Water have been thoroughly engaged as part of the GNLP 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
					Developers must also engage with Anglian Water to ensure new homes and businesses are served.	
Policy 7.2	Mr Trevor Bennett [14599]	23387	Object	This policy is not legally compliant as there has been no consultation with either the Town Council or other residents and associations as to the increase from Reg.18 of new homes from 300 to the 550 homes in Reg.19.	The overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage. 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 7.2	RJ Baker & Sons [19063]	23490	Support	Although there is a considerable level of existing deliverable commitments at Wymondham, we do feel that the town is capable of further growth within this plan period given its location within the Cambridge-Norwich corridor, the available transport links, its existing service base and its growing employment sector.	The proportion of growth in Main Towns is considered appropriate. As stated in the GNLP Wymondham has a total deliverable housing commitment for Wymondham of 2,615 homes between 2018-2038.	No change.
Policy 7.2	Mrs Janet Skidmore [19326]	23508	Object	<p>It is requested that Policy 7.1 includes a development strategy for housing at Wymondham beyond 2026. It is requested that Draft GNLP includes a commitment and timetable to submit a review of the Wymondham AAP or Draft GNLP allocates additional housing sites or a contingency housing site in Wymondham to be delivered from 2030 onwards.</p> <p>It is predicted that most of the AAP allocations will be completed by 2026, with approximately 500 dwellings to be delivered beyond that date. It is very likely that all outstanding dwellings from the AAP allocations and the proposed new allocations in Draft GNLP (as Site Refs. GNLP0354R and GNLP3013) will be completed by 2030; the remainder of the developments at Wymondham South and London Road/Suton Lane would be under construction and the two new GNLP allocations are not subject to any phasing requirements. The development strategy for housing at Wymondham effectively ends by 2030, with no strategy for residential development beyond to 2038. There will be housing and affordable housing needs that arise in Wymondham between 2030 and 2038, but these are not taken into account in Draft GNLP. It is requested that Policy 7.2 needs to define a development strategy for housing at Wymondham for the period 2030 to 2038.</p>	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

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
				There is a suitable and available site with no significant constraints at land south of Gonville Hall Farm in Wymondham (Site Ref. GNLP0320), which is promoted by Mrs Janet Skidmore.		
Policy 7.2	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]	23661	Object	<p>The supporting text refers to several significant infrastructure benefits for the town of Wymondham. This includes the access to the 'Cambridge-Norwich Tech Corridor'; the improvements to water capacity being proposed by Anglia Water; and the improved access to the railway station. As a consequence, Wymondham should accommodate a proportionally significant amount of the future growth for the 'Main Towns' as part of the GNLP.</p> <p>Aylsham, Diss and Harleston account for almost 91% of the new allocations in the emerging GNLP, whilst Wymondham and Long Stratton account for less than 10%. Welbeck Land therefore strongly disagrees with the approach being taken towards the spatial distribution of strategic growth, especially across the Main Towns.</p> <p>Welbeck Land strongly suggest the site on land north of Tuttle Lane East, Wymondham (GNLP00006), should become an allocated site. The site on land north of Tuttle Lane East, Wymondham (GNLP00006), has the ability to deliver more suitable and sustainable growth, whilst addressing the identified infrastructure issues and requirements of one of the GNLP's largest settlements.</p> <p>What is clear is that GNLP Reg 19 document appears to place an overreliance on delivery coming forward through 'windfall sites', with a significantly disproportionate amount of housing growth being directed to the 'Village Clusters'. However, the South Norfolk Village Clusters Housing Site Allocations Local Plan is yet to be produced. Therefore, it is surely unjustified to place a reliance on a document that itself has yet to be tested.</p> <p>It is believed that there are also mixed messages coming from the GNLP process. During the Reg 18(c) stage, Wymondham had a contingency identified for 1,000 new homes, however this has now been removed at the current Reg 19 stage. Conversely, Costessey (without comparable linkages or connections to Wymondham) had a contingency site identified at Reg 18(c) stage, which has carried through to an 800-unit contingency site in the</p>	<p>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 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.</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. These provide a potential housing supply of 49,492 homes, with 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.</p> <p>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 taking place currently and will have been completed before examination of the GNLP.</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>Reg 19 document. This approach appears wholly unjustified and inconsistent.</p> <p>The Strategy over relies on long standing strategic site proposals, despite the knowledge from past history that some of them are unlikely to come to fruition within the Plan period. It Introduces a change in policy direction to significantly increase reliance on development of small Village Cluster sites and reduces the clear benefit to be gained from developing sustainable and available Main Town sites. In fact, the Strategy actually reduces proposals for certain Main Towns despite there being a clear expectation of new development; is inconsistent in proposing certain Main Town sites to the detriment of other clearly more sustainable Main Town sites; and proposes a spatial growth strategy that is fatally flawed, and therefore “unsound”.</p>		
Policy 7.2	Mr John Hill [15088]	23769	Object	I disagree that 550 additional dwellings are necessary to support the continued vitality of the town. I think both allocations should be deleted from the plan at the present time.	The overall housing numbers for the plan and the housing numbers in Aylsham were consulted on at the Reg.18C consultation stage. The site which has since been added in Aylsham was consulted on as a “reasonable alternative” site at the Reg. 18C stage. 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 7.2	Woods Hardwick Planning Ltd (Paul Woods) [19974]	24116	Object	We consider that the Plan’s approach to accommodating housing growth needs is unsound. Being opposed to the inclusion of homes delivered through policy 7.5 and windfall allowance within the buffer on housing need. Also, that the buffer should be at least 20%. This is important having regard in particular to the additional growth aspirations associated with the Greater Norwich City Deal.	The GNLP contains a total housing potential of 49,492. This equates to a buffer of 22%. This is considered sufficient to meet the growth needs of the local area’s economy, as well as give a buffer in the event of certain sites being delayed.	None
Policy 7.2	Armstrong Rigg Planning (Mr Geoff Armstrong, Director) [15285]	24160	Object	<p>In the above context, it is essential that the GNLP recognises the need for growth in Long Stratton and takes the opportunity to allocate additional growth to the town in the short term to help meet pent up demand due to a lack of delivery in recent years. Additional deliverable allocations in the town would also help deliver on the City Deal growth commitments to 2026.</p> <p>The need to identify an additional deliverable housing site is particularly acute in Long Stratton and as set out in Orbit Homes’ representations to the Site Document for</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</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>Long Stratton, Land south of St Mary's Road, Long Stratton (ref. GNLP0509) is the only option that has been consistently assessed as suitable by the Council. It therefore essential that it is allocated to meet current local needs as soon as possible.</p> <p>In addition to allocating additional sites in Long Stratton, we would repeat our recommendation set out in Orbit Homes' reps to Policy 4, that to avoid repeated failures to deliver new housing in Long Stratton, the GNLP should be amended to include a trigger for a review of allocations in Long Stratton if the funding bid for the bypass is unsuccessful.</p>	<p>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>	
Policy 7.2	Rosconn Group (Ben Ward, Senior Planning Manager) [19994]	24262	Object	<p>RSL objects to Policy 7.2 as it apportions no additional growth to Long Stratton. This is unjustified as it is inconsistent with the approach taken to other locations in Greater Norwich with similar characteristics (e.g. Wymondham) where the GNLP has made new allocations. Furthermore, this choice has not been informed by a review of the JCS approach to Long Stratton to ensure that it remains justified and effective in light of the most up-to-date evidence and the considerable delays and challenges encountered to date with delivering the LSAAP's strategic allocation. Specific deliverable allocations should be made at Long Stratton to enable the settlement to grow sustainably in the short and medium term and contribute to meeting the need for new housing across Greater Norwich.</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
Policy 7.2	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24270 24282	Object	<p>The GNLP proposes that some of the Main Towns receive a disproportionately low level of growth including at Diss. This entirely undermines the recognition afforded to such settlements in paragraph 346 of the GNLP, it will undermine the vitality of such settlements contrary to paragraph 78 of the NPPF and it will not support a prosperous rural economy contrary to paragraph 83 of the NPPF.</p> <p>There are a far greater number of jobs in Diss than there are workers resident in Diss such that the town is dependent upon in-commuting to maintain its economic base. This situation is likely to be compounded by the proposed delivery of an additional 10.8ha of employment land in Diss under Policy 7.2 such that in the absence of a sufficient amount of housing the need to travel will increase contrary to paragraph 103 of the NPPF.</p>	<p>The issues raised here are addressed by the site assessment work, and sites continues GLNP1044 and GLNP1045 to be considered unsuitable for inclusion. This approach was also partly taken to give prominence to the importance of neighbourhood planning.</p> <p>The growth strategy is considered appropriate, both in terms of housing numbers and the distribution of development to be met from sites 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>	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>Diss is unsustainably proposed to receive the lowest proportional growth of any of the Main Towns with only 763 homes over the plan period which equates to 0.10 home for every resident based on the figures in Table 1 of the GNLP as compared to 0.43 homes for every resident in Long Stratton, 0.18 homes for every resident in Wymondham, 0.16 homes for every resident in Harleston and 0.13 homes for every resident in Aylsham.</p> <p>There are other sustainable and deliverable alternatives including land at Walcot Green Lane (GLNP1044) which will provide new green infrastructure linkages including circular footpath routes, market and affordable homes and self-build plots plus new highway improvements to Walcot Green Lane, all of which will provide benefits to existing and new residents alike.</p> <p>There are other sustainable and deliverable alternatives including land west of Nelson Road (GLNP1045) which will provide the opportunity for new homes or assisted living homes which would help meet the residual need for specialist accommodation in the Greater Norwich Area in a highly sustainable location.</p>	<p>Diss has many advantages, but there are particular vehicular pressures on the A1066 Victoria Road and B1077 Denmark Street. This is the primary reason for the strategic requirement for new homes being set at 400. The approach is one that enables sustainable growth to support the town's economy, and gives more opportunity to people to more frequently use the train and bus services.</p>	
Policy 7.2	Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]	24292	Object	<p>The sustainability and suitability of both Diss and Wymondham as locations for further development is welcomed by Gladman. It is considered that the allocations made at both settlements through the Local Plan however is insufficient.</p> <p>Wymondham</p> <p>Wymondham is located at the heart of the A11 Cambridge to Norwich Tech corridor meaning that the town should play an important role in fulfilling this economic potential over the plan period with further employment and housing land required. Despite its location, the GNLP only proposes to allocate 150 new homes.</p> <p>The Regulation 18 Draft GNLP included the potential provision of a contingency site around Wymondham for the delivery of up to 1,000 dwellings. Gladman note that the regulation 19 GNLP has removed the reference to a potential contingency site around the edge of Wymondham without providing justification for its removal.</p>	<p>In relation to Wymondham:</p> <p>The issues raised here are addressed by the site assessment work, and GNLP0525BR continues to be considered unsuitable for inclusion. The proportion of growth in Wymondham 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.</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 provided. This provides a potential housing supply 49,492 homes and a 22% buffer upon local housing need. On this basis GNLP0525BR was revised to an 'unreasonable' site for inclusion.</p>	None.

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>Given the quantum of development proposed to come forward in and around the Norwich Urban Area, Gladman question the inclusion of a contingency site around Costessey as opposed to Wymondham. If the market is failing to deliver homes around the edge of Norwich, providing further land for residential development in the same location will not solve the matter.</p> <p>Gladman believe that not only should a contingency site around Wymondham be included, but that the site should be allocated. Land off Norwich Common, Wymondham represents a logical extension to the settlement and should be further considered for allocation through the plan making process.</p> <p>A thorough evidence-based assessment of all effected land parcels, together with wider related land has not been undertaken to consider whether strategic gaps remain a relevant and necessary designation to prevent the coalescence of settlements. As such, Gladman contend that the inclusion of the 'rolling over' of the strategic gap policy without a review is not based upon up-to-date evidence and is therefore not sound.</p> <p>Diss</p> <p>Reasons stated for limiting the level of growth towards Diss are attributed to environmental constraints and traffic constraints, based upon local evidence. Gladman are promoting land south of Burston Road (GNLP4049). Assessed following the close of the Regulation 18 consultation, the site is recognised as suitable for further consideration (Diss booklet of sites evidence base paper). Based on the concept plan prepared to date we have sought to address 'amber' scoring issues, summarised as townscape and landscape considerations, to show that environmental impact is not an insurmountable constraint. Therefore, the issue in bringing this site forward is not an environmental one but instead highlighted as highways.</p> <p>Recognising the highways constraints is therefore considered inappropriate to leave the decisions around the majority of housing allocations of Diss to the emerging neighbourhood plan. Seeking to resolve the</p>	<p>A question was also raised on why include a contingency in Costessey? In answer, there are two factors. Firstly that it is at the urban fringe of the settlement hierarchy. Secondly that the site could be deliverable, given the evidence of nearby other developments.</p> <p>Another question was also raised in relation to the strategic gap between Wymondham and Hethersett. The GNLP provides high-level protection of landscapes, with detailed policy elsewhere in the local plan. Should a review be 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.</p> <p>In relation to Diss:</p> <p>The growth strategy is considered appropriate, both in terms of housing numbers and the distribution of development to be met from sites 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. This is the primary reason for the strategic requirement for new homes being set at 400. The approach is one that enables sustainable growth to support the town's economy, and gives more opportunity to people to more frequently use the train and bus services.</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>highways issue in Diss is considered to be a strategic matter best tackled during the local plan making process, not through the neighbourhood plan.</p> <p>Paragraph 102 of the Framework is clear that transport issues should be considered from the earlier stages of plan-making so that potential impacts of development on transport networks can be addressed. Whilst issues have been identified it is considered that there is currently insufficient evidence to seek to limit the quantum of development directed towards to Diss for these reasons. If this was such an insurmountable issue, referring site allocations to the neighbourhood plan, a mechanism inappropriate to tackle highways constraints is only likely to exacerbate the highways issue.</p> <p>The Diss Network Improvement Strategy (April 2020) has identified a number of junctions requiring improvement and options for providing these improvements. It appears that little regard has been had for changing transport technology and usage over the plan period and how this could alleviate highways concerns. For example, as a longer-term impact of the coronavirus pandemic commuting patterns may change.</p> <p>Further testing should have been undertaken to determine a quantum of development that could be satisfactorily delivered without the need for new link roads. .. In this regard, further development than identified would be expected to contribute towards unlocking the necessary improvements identified.</p>		
Policy 7.2	AAH Planning Consultants (Joe O'Sullivan) [19998]	24310	Object	<p>It is important to note that Paragraph 60 of the NPPF and the associated guidance within the PPG are clear that the standard method represents the "...minimum number of homes needed..."</p> <p>The Council have calculated the Local Housing Need, based upon the Standard Methodology resulting in 1,961 dwellings a year, but this calculation was carried out in June 2018. Further, the LHN, when calculated using the Standard Methodology, can fluctuate year to year based upon the housing projections, and the Standard Methodology doesn't take account of economic growth. We therefore, recommend a Housing Requirement between the aggregated Local Housing Need for the three authorities calculated by the Standard Methodology</p>	<p>The issues raised here are addressed by the site assessment work, and GNLPO599 is considered unsuitable for inclusion. This approach was also partly taken to give prominence to the importance of neighbourhood planning.</p> <p>The growth strategy is considered appropriate, both in terms of housing numbers and the distribution of development to be met from sites 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>	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 a requirement that takes account of the economic growth that the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land.</p> <p>Given the status of Diss and the Towns access to services, it is therefore difficult to comprehend the new allocation of only 150 dwellings in the GNLP with the future allocation of 250 dwellings in the Diss and District Area Neighbourhood Plan. Policy GNLP0102 allocates land at Frontier Agriculture Ltd, Sandy Lane, Diss (3.61 ha) for residential development to accommodate approximately 150 homes. This site is located to the east of the railway, so noise mitigation will be required and is in an area historically characterised by employment premises, and the site is likely to be contaminated also. The preamble to the policy also states that 'the number of homes sought is set at 150 due to the highly sustainable town centre location, but the exact figure will be subject to detailed design and viability considerations.' The site is unlikely to meet the definition of a deliverable site within the Framework. Its allocation is even more difficult to comprehend when our clients site at land to the North of Walcot Rise, Diss is not constrained by such matters explained above. There is a willing landowner who has entered into a promotion agreement with our client Land Allocation Ltd who has submitted an outline planning application under reference 19/1555, for up to 90 residential dwellings.</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 more opportunity to people to more frequently use the train and bus services.</p>	
Policy 7.2	Strutt & Parker (Adam Davies, Associate Director) [17169]	24314	Object	<p>Whilst we would agree that some small sites may be appropriate for allocation within a Neighbourhood Plan, we consider that the responsibility to ensure that the housing needs of older people are met in full rests solely on the Greater Norwich Authorities, to be dealt with through strategic policies within the Plan. The NPPF requires strategic policy makers to plan for this specific group of the community, as also confirmed within the 'Housing for older and disabled people' PPG. It is not considered a sound approach to defer this to the Neighbourhood Plan process.</p> <p>Paragraph 355 of the Plan indicates that Diss has the widest range of shops and services of the Main Towns and at paragraph 356 that its locational attributes and connectivity provide the potential for economic growth as an enhanced centre, serving a large hinterland in both</p>	<p>The issues raised here are addressed by the site assessment work, and GNLP0341 is considered unsuitable for inclusion. It is also noted that this site, known as 'Parish Fields', received 43 objections at the Regulation 18C stage.</p> <p>On the subject of specialist older people's housing, the GNLP is considered sound. Specific allocations are being made at Barrack Street, Colney, Taverham, Aylsham and Harleston. Policy 5 also encourages older people's housing on sites with good access to public transport (including on sites allocated for residential development).</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
				South Norfolk and Mid Suffolk. Accordingly, and in response to the shortfall in provision to meet the identified need for older persons' accommodation within the Plan, it is considered that the GNLP03341 should be allocated in the draft Local Plan to further contribute to meeting the identified needs of older people.		
Policy 7.2	Bidwells (Mr Darren Cogman, LP Contact) [12857]	24370	Support	<p>The proposed Settlement Hierarchy and the identification of Aylsham as a Main Town that collectively with the other Main Towns (which are Diss (including part of Roydon), Long Stratton, Harleston and Wymondham) will accommodate 14% of the housing growth during the period to 2038 is strongly supported.</p> <p>The Main Towns, including Aylsham, play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. They represent engines of rural growth and it is essential that they are able to grow at appropriate scales, having regard to infrastructure and environmental issues.</p> <p>Aylsham has a good range of shops and services with local employment opportunities and to support the continued vitality of Aylsham, and reflect its sustainable nature, approximately 550 additional homes are proposed to be allocated across two sites.</p> <p>This approach is entirely consistent with paragraph 72 of the NPPF, which advises that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed and supported by the necessary infrastructure and facilities."</p>	Support noted.	No change.
Policy 7.2	David Lock Associates (Heather Pugh, Partner) [20014]	24460	Support	We support Policy 7.2 as currently drafted in respect of the spatial strategy decision to limit further piecemeal 'edge' growth of Wymondham whilst the balance of the existing commitments allocated through the AAP are constructed. The decision in the Reg 19 Plan to allocate only a small number of additional residential dwellings at Wymondham and no contingency allocations (para 181 refers), is supported: this is a sound approach which will allow time for effective consideration of the new settlement propositions in the area to be undertaken before further allocations are considered.	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
				Importantly for existing communities, the consideration of new settlement options for growth at Wymondham also presents a unique opportunity to simultaneously reinforce and strengthen the protection and mitigation given to locally sensitive features. For example, in the Silfield Garden Village (SGV) context, considerations such as strengthening the policy protection and releasing development pressure from the strategic gap between Wymondham and Hethersett; mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park to the west of SGV; and providing new secondary education provision in a location which is easily accessible to the existing community of Wymondham as well as new residents: all 'whole-town' benefits which a new settlement at SGV could bring.		
Policy 7.2	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24465	Support	We welcome the reference to enhancing existing green infrastructure (GI) in the supporting text and in the final paragraph of the policy. Instead of the basic maps 8A and 8B, if reference could be made to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF.	Support from Natural England is noted. However, we would not object if the Inspector wishes to include reference to the GI strategy within the policy.	No change.  However, If the Inspector is minded to make a change as a main modification, inserting reference to the GI strategy within the policy as a Proposed Modification, then the GN authorities have no objection to this.

**Policy 7.3 – The Key Service Centres**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
7.3	Mr Hugh Ivins [14963]	23338	Support	It is surprising that no further housing allocations are proposed. REP2 has been superseded by permission 20180963 and REP1 has application which does not fully correspond to allocation.	Support noted. 20180963 is acknowledged in supporting text for REP2. REP1 application has not yet been determined. The GNLP will be a material consideration for planning applications.	No change
7.3	Glavenhill Limited [19394]	23795	Object	Soundness objection raised and challenge compliance with duty to cooperate: Rationale for not allocating GNLP0480R is unjustified, therefore unsound. The allocations in the rural areas should be reduced in favour of Cambridge-Norwich Hi-tech corridor. The site is on the edge of the strategic gap but landscaping could ensure no significant adverse landscape impact.	The uplift to the carried forward allocation provides a suitable level of growth for Hethersett so as not to overwhelm services when added to growth allocated in Hethersett in the existing local plan. In this context, the impact on the landscape is considered to outweigh the benefit of allocating GNLP0480R.	No change
7.3	ACLE PARISH COUNCIL (Mrs SALLY ALDRIDGE, COUNCILLOR) [19791]	23253	Object	Legal and soundness objections raised and challenge compliance with duty to cooperate: Acle Parish Council have not been made aware of any consultation.	Acle PC were consulted throughout Reg 18 and Reg19; the parish clerk made representations online (albeit clerk's profile identifies Upton PC).	No change
7.3	Mr Stephen Carter [19793]	23265	Object	Legal and soundness objections raised, and challenge compliance with duty to cooperate: The consultation of the plan was not carried out in accordance with the Statement of Community Involvement (2016) (Amended 2019). It appears objections made by the local council [Acle?] have not been considered.	The SCI has been fully complied with. The site assessment booklets have extracts from the Statement of Consultation which shows how we have considered all comments made.	No change
7.3	Upton with Fishley Parish Council (Mrs Pauline James, Clerk) [13165]	23411	Object	Legal and soundness objections raised as SCI has not been complied with. Reg18C consulted on proposal for 200 homes, Reg 19 proposes 340 homes, without having consulted on these additional 140 homes. The proposal for the 340 homes was posted on the Reg 18 consultation as an attachment to a message of support from the landowner, so no one saw it.	The SCI has been fully complied with. Regulations allow for changes in plans between the Regulation 18 and 19 stages. The changes in the Reg 19 version are considered to be appropriate in scale and to deliver the link road which will benefit Acle. Site policies address various issues raised in Reg 18 stage.	No change
Policy 7.3 (para. 371-379)	Welbeck Strategic Land III Ltd (Ms Jennifer Liu, Associate Director) [19925]	23660	Object	Legal and soundness objections raised as although the aspiration for a strategic gap between the settlements of Wymondham and Hethersett is noted, the land north of Tuttle Lane East in Wymondham could help to deliver an enforceable boundary to this northern part of the town.	Notwithstanding the site is in Wymondham, a Main Town, Tuttle Lane East is considered to be the northern boundary of the town as currently defined. Site GNLP0006 is separate from the strategic gap.	No change
7.3	Glavenhill Limited [19394]	23891	Object	Soundness objection raised and challenge compliance with duty to cooperate: Only 695 new homes are proposed to come forward through new allocations within all nine KSCs, which is disproportionate. The dispersal strategy (particularly within South Norfolk) is unsustainable and likely undeliverable. Lack of allocations	The proportion of growth in KSCs reflects the current distribution of homes in KSCs and is therefore appropriate to support services in these centres serving rural hinterlands. In Poringland/ Framingham Earl, there are significant levels of commitment (at the base date of the plan) which	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 Poringland/ Framingham Earl is unsound. Significant proportion of commitment has been delivered.	are the context for an absence of new housing allocations in the GNLP.	
7.3	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24106	Object	Soundness objection raised as many KSCs have a disproportionate level of growth. Comparing homes per resident, Brundall is lower than other KSCs. GNLP is likely to compromise the vitality of Brundall. Constraints relied upon do not stand up to scrutiny.	The proportion of growth in KSCs reflects the current distribution of homes in KSCs and is therefore appropriate. Each settlement was assessed on its own merits and in Brundall the outstanding permission for 175 dwellings provides the appropriate level of growth.	No change
Policy 1 Table 6 Policy 7.5	Woods Hardwick Planning Ltd (Paul Woods) [19974]	24117	Object	Soundness objection raised as the distribution of homes across all tiers of the settlement hierarchy in Policy 1 and Table 6 should exclude windfall and Policy 7.5 homes. The KSCs should receive new allocations of 777 dwellings.	The proportion of growth in KSCs reflects the current distribution of homes in KSCs and is therefore appropriate. Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted.. Please see response to reps 24113 and 24114 for Policy 1 and Table 6.	No change
7.3 Reepham	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24126	Object	Policy 7.3 of the GNLP is unsound as Reepham has a disproportionately low amount of growth to Reepham. Constraints either do not exist or do not apply to at least some of the potential sites. Policy 7.3 also does not provide for the identified healthcare needs or local business needs in Reepham.	Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted. The plan provides for a range of employment locations, but cannot address the needs of individual businesses, which are best met through the planning application process. Please see response to rep 24128 dealing with Reepham.	No change
7.3	Hopkins Homes Limited (Mr Chris Smith, Development Planner) [14202]	24171	Object	Soundness objection raised as Mulbarton and Scole should be identified as Key Service Centres. Wroxham should have allocations. Constraints are unsubstantiated by evidence.	The settlement hierarchy was considered during Reg 18. Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted.	No change
7.3	Pegasus Group (Mr Robert Barber) [19984]	24185	Object	The absence of additional allocations in Loddon is not justified, resulting in disproportionately low growth which will compromise the vitality of the settlement contrary to para 78 of the NPPF.	Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted. Please see response to rep 24554 dealing with site assessment booklet for Loddon.	No change
7.3	Bidwells (Mr Iain Hill, Partner) [16273]	24192	Support	A reasonable level of growth is proposed in KSCs.	Support is noted.	No change
7.3	Savills (Mr Jonathan Dixon, Director - Planning) [12969]	24198	Object	Soundness objection raised as settlement hierarchy fails to reflect current circumstances, e.g. Northern Distributor Road, which have changed context of some settlements. Horsford should be reclassified as a KSC.	The settlement hierarchy was considered during Reg 18. Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted. See also response to rep 24199 for Horsford map.	No change
7.3 Hethersett	Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	24239	Object	Soundness objection raised as Hethersett should receive more growth. Policy 7.3 does not provide for educational or care/retirement housing needs in Hethersett or support provision of sports facilities.	Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted. There is a carried forward allocation for housing with care in Hethersett. The level of growth in Hethersett 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
					being addressed by school expansion. See response to rep 24235 for Hethersett comments.	
7.3 Poringland	Gladman Developments (Mr Richard Naylor, Senior Land Planner) [19996]	24293	Object	The level of growth at Poringland should be increased to provide flexibility and meet land supply. Site GNLP2153 could provide this.	Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted. Poringland has high levels of commitment (at the plan's base date). Site GNLP2153 is not allocated.	No change
7.3 Horsford	Howes Percival LLP (Mr Jamie Childs) [20003]	24397	Object	Soundness objection raised as Horsford should not be part of a 'village cluster' and should instead form part of a Key Service Centre,	The settlement hierarchy was considered during Reg 18. Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted.	No change
7.3	Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	24466	Support	Instead of the basic maps 8A and 8B, reference should be made in the policy to a specific GI strategy or similar document, to assist delivery of a strategic GI network.	The policy as worded is sound. However, we would not object if the Inspector wishes to include reference to the GI strategy within the policy.	No change  However, If the Inspector is minded to make a change as a main modification, inserting reference to the GI strategy within the policy as a Proposed Modification, then the GN authorities have no objection to this.

**Policy 7.4 – Village Clusters**

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 382	Niall Cook [14744]	23231	Object	<p>Objections on legal compliance, soundness and duty to cooperate grounds in relation to South Norfolk Village Clusters plan.</p> <p>How can the GNLP be published with such a huge part of it missing. It is unclear whether the proposed South Norfolk plan will have its own policies (which may contradict those in the GNLP). It should be made clear that it is simply an appendix of the site allocations and not a 'local plan' for that area and which policies take priority in the event of any conflict. It should also be explained how planning decisions will be made when the GNLP comes into force and the South Norfolk plan has not yet been published.</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.	No change
Para 382	Mr Trevor Bennett [14599]	23386	Object	<p>Objections on legal compliance, soundness and duty to cooperate grounds in relation to South Norfolk Village Clusters plan.</p> <p>Consider that the failure to include South Norfolk villages makes the whole plan not legally compliant. The GNLP puts forward its strategy as 3 councils working together and has increased the number of homes to over 49000 in Reg 19 without consultation, whilst ignoring one significant area of the region.</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.	No change
Para 382	CPRE Norfolk (Michael Rayner) [14427]	23435	Object	<p>Objection on soundness grounds in relation to South Norfolk Village Clusters Plan.</p> <p>The GNLP Reg 19 consultation has commenced before the South Norfolk document has been published for its Reg 18 consultation, despite the LDS stating that consultation would be Feb/March 2021. Both documents should follow the same, or at least similar, timetable.</p> <p>By referring to a minimum of 1200 houses it is possible that the South Norfolk plan could include a far greater number further increasing overall housing numbers. Difficult for statements in the GNLP about density and access to services to be accurate.</p> <p>There are inaccuracies in the South Norfolk SCI which refers to the emerging local plan as the GNLP with no reference to the South Norfolk document. The GNLP is also described as covering the period to 2036 whereas it should be 2038.</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> <p>The timing of Regulation 18 consultation on the South Norfolk Village Clusters Plan and the content of the South Norfolk SCI are outside the direct control of the GNLP team, though it is noted that Reg. 18C draft plan consultation is currently being undertaken.</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
Para 387	Niall Cook [14744]	23232	Object	Soundness objection raised. Policy 7.4 is silent on the matter of self/custom build so the statement at paragraph 387 is contrary to the wording of Policy 7.5 which allows for small-scale windfall development in village clusters without a settlement boundary, with positive consideration given to self and custom build. It should be made clear that Policy 7.5 supports small scale self/custom build housing.	Policy 7.4 is not silent on the matter of self/custom build. As mentioned in the policy and at paragraph 387 it is supported in the context of affordable led development adjacent or well related to settlement boundaries which may have an element of market housing. Paragraph 390 and Policy 7.5 make it clear that self/custom build will also be supported in the context of small-scale windfall development outside settlement boundaries.	No change
Policy 7.4	Broads Authority (Natalie Beal) [12415]	23349	Support	General support for the plan. Some comments raised which are not considered to be soundness issues:  The policy implies that rural exception sites can be 'well related' to settlement boundaries but the NPPF says that such sites should be adjacent. Why is approach being changed? This is not explained in the document, how far from a settlement boundary can development be? What does well related mean? This may affect the setting of the Broads and if so the status of our comment may need to be strengthened. Proposed changes to the NPPF may be relevant.	Paragraph 71b of the NPPF states that entry level exception sites should be adjacent to existing settlements but does not specify that they need to be adjacent to settlement boundaries. It is therefore considered that the wording used in Policy 7.4 is sound. With regards to the meaning of 'well related' this will be assessed through the planning application process for specific sites having regard to policy 7.4 which states that sites should have good access to services, including safe route to school and accord with other policies of the local plan.	No change
Policy 7.4	Georgina Brotherton [19554]	23408	Object	Objections on legal compliance and soundness grounds.  Support the penultimate paragraph which now allows for the expansion of small and medium sized sites. Object to the site areas contained within the employment areas table. Block L and the bund to the west of Abbey Farm Commercial Park in Horsham St Faith should be included.	Support for the penultimate paragraph noted. The site at Horsham St Faith was added to the table following comments at Regulation 18C. The site promoter has requested changes to the area of site allocation GNLP2007R/4061/HNF1 through the Part 2 – Sites Plan, which if accepted as a Proposed Modification by the Inspector, will require changes to the figures in the table	No change  (Possible change to the figures in the table for Horsham St Faith depending upon whether a proposed modification is made in relation to the site allocation).
Policy 7.4	Carter Jonas LLP (Brian Flynn) [12669] on behalf of Noble Foods Ltd [19330]	23528	Object	Soundness objection raised. Site GNLP2143 at Marsham should be removed from the plan and replaced by site GNLP3035 to ensure most suitable sites are allocated. The strategy for village clusters does not consider the circumstances that exist at particular villages, such as site GNLP3035 in Marsham which is currently unused. The approach of infill development within settlement boundaries in villages is likely to provide a very limited amount of housing and no affordable.	See Part 2 Sites Plan for further discussion of specific sites. Policy 7.4 provides the strategic context for development in village clusters, including the minimum number of new homes to be provided, the individual circumstances of particular villages have been taken into account through the site assessment process that accompanies Part 2 of the Plan. It is accepted that infill within settlement boundaries will provide a limited amount of housing and likely no affordable housing. The housing requirement (including affordable housing) will predominantly be provided through allocations in village clusters and affordable housing development where appropriate as specified in the 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
Policy 7.4	James Bailey Planning Limited (James Bailey) [19927] on behalf of Welbeck Strategic Land Ltd (Jennifer Liu) [19925]	23659	Object	<p>Objection on legal compliance and soundness grounds in relation to an overreliance on delivery through 'windfall sites' and disproportionate amount of housing growth being directed to village clusters. In the absence of the South Norfolk Village clusters plan the quantum of growth cannot be relied on.</p> <p>The 1200 new homes in South Norfolk Villages represents an almost 50% increase on the committed development which would appear at odds with the approach taken to the larger more sustainable settlements in towns or key service centres. This appears to be a significant departure from the approach at Reg 18C and contrary to good sustainable planning.</p> <p>The policy also promotes windfall development so it is questioned whether the approach to village clusters is actually needed. Windfall development could be unregulated. How has approach been reached. Policy 7.4 also supports infill development and additional affordable/market housing schemes in addition to windfall potential</p>	<p>The approach to village clusters is considered to be sound and it is not accepted that a disproportionate amount of housing growth has been directed towards village clusters. Overall, the plan locates development so that new housing will be close to every-day services and jobs (mainly through policies 1 and 7). The great majority of the planned development is in and adjacent to our urban areas and larger villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to services to support their retention.</p> <p>The approach to windfall development in policy 7.4 is considered to be appropriate and will be regulated through the Development Management process.</p>	No change
Policy 7.4	Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	23689	Object	<p>Objection on legal compliance and soundness grounds.</p> <p>The total number of houses and the distribution of development conflict with the Climate Change objectives and potentially contradict objectives set in regard to environmental protection and enhancement.</p> <p>The GNLP should remove plans to disperse housing to village clusters and via policy 7.5 because this has a greater negative impact on the environment and landscape then concentrating development in or near Norwich. The GNLP should listen to parish councils and provide affordable housing in villages via Rural Exception sites</p>	<p>Overall, the plan locates development so that new housing will be close to every-day services and jobs (mainly through policies 1 and 7). The great majority of the planned development is in and adjacent to our urban areas and larger villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to services to support their retention.</p> <p>80% of the GNLP planned housing growth is in the Norwich Urban Area and the towns. This compares to the current 65% of the population who live in these areas. Overall then the strategy promotes more concentration of the population with a consequent positive impact on addressing climate change and is not a strategy of dispersal.</p> <p>However, some growth in villages is also necessary to promote the retention of services which can be beneficial in relation to climate change. Further service loss will lead to more need to travel for village residents. Also, some</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
					growth in villages is needed for equity reasons so that people who grow up in a village have a reasonable expectation of being able to get a home in that village is they wish to do so.	
Policy 7.4	Robert Gower [19504]	23949	Object	<p>The policy to allow infill development within settlement boundaries and the identification of a settlement boundary at Thorpe End are both supported, however to ensure the plan is sound a settlement boundary re appraisal should take place before the plan is submitted for examination, alternatively the wording of Policy 7.4 should be amended to allow small scale windfall development on sites that would form a natural adjustment to the settlement boundary. This should be separate to the allowance under Policy 7.5.</p> <p>There should be consistent use of either 'settlement boundary' or 'development boundary' for clarity.</p>	<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 other local plan documents.</p> <p>With regard to the consistent use of the term 'settlement boundary' or 'development boundary', no changes are required for soundness however the GNLP authorities accept that the consistent use of a single term could aid clarity and this could be actioned through a minor modification.</p>	A minor modification is proposed to ensure a consistent terminology for settlement boundaries is used throughout the plan for clarity.
Policy 7.4	Bidwells (Iain Hill) [16273]	24093	Support	Village clusters (such as Horsham St Faith) are sustainable rural locations and it is wholly appropriate that they should accommodate a reasonable amount of growth.	Support noted	No change
Policy 7.4	Woods Hardwick Planning Ltd (Paul Woods) [19974]	24118	Object	Soundness objection in relation to the plans approach to accommodating housing growth. The increased allocation between Reg 18C and Reg 19 has been skewed towards the Norwich Urban Area at the expense of the village clusters. It should have been distributed to accord with the percentage proportionate distribution at Reg 18C leading to additional growth in village clusters.	Overall, the plan locates development so that new housing will be close to everyday services and jobs (mainly through policies 1 and 7). The great majority of the planned development is in and adjacent to our urban areas and large villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to service to support their retention. The increased allocation between Reg 18C and Reg 19 has been directed towards the best sites and not based on a proportionate distribution across the hierarchy.	No change
Policy 7.4	Armstrong Rigg Planning (Geoff Armstrong) [15285]	24161	Object	Soundness objection to the production of a separate South Norfolk Village Clusters Plan. This undermines the strategic approach to delivery and is not in accordance with the NPPF which makes clear that strategic policies should make sufficient provision for housing and provide a clear strategy.	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	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
					including the minimum number of dwellings to be provided.	
Policy 7.4	Hopkins Homes Ltd (Chris Smith) [14202]	24172	Object	Soundness objection raised. Whilst there is support for the identification of village clusters to accommodate additional residential development to support the sustainable growth of rural areas there should be no defined numerical restraint upon the size of site area or the number of dwellings proposed for allocation in this way. Instead allocations should be proportionate to the size of settlement cluster and range of facilities available to meet local housing needs.	The approach taken towards allocations in village clusters reflects school capacity or ability to grow and the availability of other accessible services, e.g. the 'social capacity' of the cluster and this is considered to be sound.	No change
Policy 7.4	Breckland District Council (Rachel Gibbs) [19646]	24231	Object	Soundness and duty to cooperate objections.  Concerns over impact of cumulative growth.	Breckland and the Greater Norwich LPAs have supported coordinated growth in the Cambridge Norwich Tech Corridor through various initiatives. The issues of the cumulative impact of growth on infrastructure such as power and water supplies have been considered and are being addressed through cooperative work such as the NPPF and the Cambridge Norwich Tech Corridor Initiative. These, along with local plans, inform the strategic planning of utilities companies. The councils will work together, as per the Statement of Common Ground to ensure the impact of cumulative growth is addressed.	No change
Policy 7.4	Rosconn Group (Ben Ward) [19994]	24263	Object	Legal compliance and soundness objections.  The overall amount of growth apportioned to village clusters is significantly greater than that apportioned to key service centres despite them offering a more sustainable location for growth. Also the net growth apportioned to village clusters is slightly higher than the net growth apportioned to market towns. This is inconsistent with the spatial strategy in Policy 1 and would not lead to a sustainable pattern of growth. More land should be allocated in Main Towns such as Long Stratton.	Overall, the plan locates development so that new housing will be close to every-day services and jobs (mainly through policies 1 and 7). The great majority of the planned development is in and adjacent to our urban areas and larger villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to services to support their retention.  80% of the GNLP planned housing growth is in the Norwich Urban Area and the towns. This compares to the current 65% of the population who live in these areas. Overall then the strategy promotes more concentration of the population with a consequent positive impact on addressing climate change and is not a strategy of dispersal.  However, some growth in villages is also necessary to promote the retention of services which can be beneficial in relation to climate	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
					change. Further service loss will lead to more need to travel for village residents. Also, some growth in villages is needed for equity reasons so that people who grow up in a village have a reasonable expectation of being able to get a home in that village is they wish to do so.	
Policy 7.4	Le Ronde Wright (Lewis Matthews) [16578]	24340	Object	Policy 7.4 is not sound due to the restrictive nature of the policy and the undermining of the vitality of village clusters. The policy does not allow for the realistic growth and expansion of employment uses to the detriment of rural economies and contrary to the NPPF. Covid 19 has had an impact on the working environment, in terms of the need for smaller more flexible office spaces and this is not addressed through Policy 7.4. There needs to be further assessment of needs and trends. Consideration should be given to allocating small sites in rural locations e.g. Little Plumstead.	<p>The purpose of policy 7.4 is to encourage sustainable development in village clusters and allows for small scale employment growth within settlement boundaries, through the conversion of rural buildings or the expansion of existing small and medium sized employment sites. Further policies covering employment development in rural areas can be found in the relevant authorities Development Management policies documents.</p> <p>The GNLP authorities have had the economic evidence base updated to reflect recent changes with Covid 19, Brexit and changes to the planning system and it is important that the plan takes a long-term view of development needs across the plan period.</p>	No change
Policy 7.4	Mrs Nicole Wright [14312]	24357	Object	Policy 7.4 is not sound as it fails to take account of the need to prioritise and redevelop brownfield sites or the needs of existing rural businesses outside settlement limits. The GNLP is in conflict with the NPPF that states that housing should enhance or maintain the vitality of rural communities and provide opportunities for villages to grow and thrive.	<p>There are several mentions throughout the plan to the general need to make efficient use of brownfield sites and minimise the loss of greenfield land</p> <p>The focus of Policy 7.4 is to encourage sustainably located development to support rural life and services in accordance with the NPPF and it must be recognised that not all brownfield sites in rural areas will contribute towards that aim due to their relative isolation from existing settlements and such schemes would therefore need to be considered on their merits through the planning application process.</p> <p>The policy as written does allow for the potential expansion of existing small and medium sized businesses in rural areas subject to meeting other policies in the development plan.</p>	No change
Policy 7.4	Mrs Nicole Wright [14312]	24359	Object	Soundness objection raised. Policy does not comply with national policy and is not effective. It does not address the need to prioritise brownfield sites ahead of greenfield sites.	There are several mentions throughout the plan to the general need to make efficient use of brownfield sites and minimise the loss of greenfield land	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 focus of Policy 7.4 is to encourage sustainably located development to support rural life and services in accordance with the NPPF and it must be recognised that not all brownfield sites in rural areas will contribute towards that aim due to their relative isolation from existing settlements and such schemes would therefore need to be considered on their merits through the planning application process.	
Policy 7.4	Richard Bacon [17000]	24379	Object	The GNLPs policies do not reflect the level of demand for self and custom build and this should be strengthened.	It is considered that the policies in the GNLP do reflect the level of demand for self and custom build. Policy 7.4 allows for self/custom build as part of affordable housing led development in village clusters. In addition, policy 5 includes a clear requirement to support custom/self build and to diversify the house building market by seeking that at least 5% of plots on residential proposals of 40 dwellings or more should provide for self/custom build plots.	No change
Policy 7.4	Howes Percival (Jamie Childs) [20003]	24398	Object	Soundness objection raised. Horsford should not be part of a village cluster and should instead form part of a Key Service Centre. Comments made in connection with site GNLP0283 and GNLP0283R	The settlement hierarchy was considered during Regulation 18. Each settlement was assessed on its own merits based on service provision, existing commitment and the sites submitted. 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.	No change
Policy 7.4	ClientEarth (Sam Hunter Jones) [19067]	24411	Object	<p>Legal compliance and soundness objections raised.</p> <p>Many of the village clusters are situated in remote areas with limited access to public transport. The rural location of development proposals under this policy would be expected to contribute to a relatively high reliance on personal car use.</p> <p>It is likely that development will occur at a number of greenfield sites, which would be expected to result in a net loss of agriculturally and ecologically valuable soils and a net loss of BMV land. This would be permanent and would reduce the carbon sink capacity of soils across the plan area.</p>	<p>Overall, the plan locates development so that new housing will be close to every-day services and jobs (mainly through policies 1 and 7). The great majority of the planned development is in and adjacent to our urban areas and larger villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to services to support their retention.</p> <p>80% of the GNLP planned housing growth is in the Norwich Urban Area and the towns. This compares to the current 65% of the population who live in these areas. Overall then the strategy promotes more concentration of the population with a consequent positive impact on addressing climate change and is not a strategy of dispersal.</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>However, some growth in villages is also necessary to promote the retention of services which can be beneficial in relation to climate change. Further service loss will lead to more need to travel for village residents. Also, some growth in villages is needed for equity reasons so that people who grow up in a village have a reasonable expectation of being able to get a home in that village is they wish to do so. Agricultural land classification was taken into account as part of the site assessment process.</p>	
Policy 7.4	Le Ronde Wright (Alistair Curran) [20009]	24448	Object	<p>Soundness objection to the separate South Norfolk Village Clusters plan. The policy states that 1200 homes will be allocated within South Norfolk but it does not specify where development will be located or whether it will be equally distributed or concentrated in a few key areas. The policy should be reconsulted on when the South Norfolk plan becomes available.</p> <p>The policy is also too restrictive to facilitate growth and ensure vitality of rural communities in accordance with the NPPF. Infill development will encourage the subdivision of plots and the creation of highly density development which is incongruous with the historic evolution of most traditional villages.</p> <p>Insufficient information as to how the village cluster allocations will look and function</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> <p>It is considered that policy 7.4 will facilitate growth and ensure the vitality of rural communities in accordance with the NPPF. Planning applications for infill development within settlement boundaries will have to accord with Development Management policies in relation to design, density, layout etc</p>	No change
Policy 7.4	David Lock Associates (Heather Pugh) [20014]	24461	Object	<p>Soundness objection. The SN Village clusters plan proposed to allocate sites for 1200 homes. As a result almost 10% of Greater Norwich development to 2038 will be delivered through a dispersed settlement strategy.</p> <p>Object to the decision to draw up two plans in parallel but not to jointly assess or record through the HELAA or SA process the overall environmental impact.</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 is being prepared separately by South Norfolk Council but it will have to accord with the strategic policies in the GNLP including the minimum number of dwellings to be provided.</p> <p>The quantum of development assigned to the village clusters in the plan is considered to be acceptable. Over 80% of the planned housing growth is in the Norwich Urban area and the towns. Some growth in villages is essential to support their continued vitality and it has been</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
					located where there is good access to services to support their retention.	
Policy 7.4	Natural England (Louise Oliver) [13804]	24467	Support	<p>We welcome reference to enhancing existing green infrastructure in the supporting text and the final paragraph of the policy.</p> <p>Instead of basic maps 8A and 8B, if reference could be made to a specific GI strategy or similar, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with NPPF.</p>	Support for the reference to green infrastructure is noted. With regard to comments about maps 8A and 8B 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 refer to the GI strategy .	No change
Policy 7.4	Le Ronde Wright (Alistair Curran) [20009]	24481	Object	<p>Soundness objection raised. Policy 7.4 fails to prioritise brownfield development or take into consideration brownfield land that is not infill which could make a more effective use of the land. The policy also does not address the need for enhancing the environment and improving the sustainability of existing rural businesses that may exist outside settlement limits.</p> <p>Recent trends for home working not considered. Evidence base does not adequately reflect current circumstances and future work needs to be undertaken.</p>	<p>There are several mentions throughout the plan to the general need to make efficient use of brownfield sites and minimise the loss of greenfield land</p> <p>The focus of Policy 7.4 is to encourage sustainably located development to support rural life and services in accordance with the NPPF and it must be recognised that not all brownfield sites in rural areas will contribute towards that aim due to their relative isolation from existing settlements and such schemes would therefore need to be considered on their merits through the planning application process.</p> <p>The policy as written does allow for the potential expansion of existing small and medium sized businesses in rural areas subject to meeting other policies in the development plan.</p> <p>The GNLP authorities have commissioned work to update the economic evidence base to reflect recent changes with Covid 19, Brexit and changes to the planning system and it is important that the plan takes a long-term view of development needs across the plan period.</p>	No change
Policy 7.4	Sirius Planning (Francesca Wray) [15640]	24550	Object	<p>Soundness objection raised. The approach to employment development is overly restrictive and may restrict future economic development in rural areas. To be consistent with national policy small scale employment development should also be acceptable in principle where a rural location outside settlement boundaries can be justified. E.g. refuelling stations have a functional need to be located off strategic roads.</p>	<p>The purpose of policy 7.4 is to encourage sustainable development in village clusters and allows for small scale employment growth within settlement boundaries, through the conversion of rural buildings or the expansion of existing small and medium sized employment sites. Further policies covering employment development in rural areas can be found in the relevant authorities Development Management policies documents and schemes such as refuelling</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
				There are no policies within the GNLP for employment development within the countryside. A criteria-based policy allowing windfall development in the countryside should be included which will provide flexibility in relation to varying locational requirements.	stations would be considered on their merits through the planning application process.	

**Policy 7.5 – Small Scale Windfall Housing Development**

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 390	Niall Cook [14744]	23228	Support	SNC miscounting self-builds	Support welcomed. Comment noted	None
Policy 7.5	Niall Cook [14744]	23230	Support	Support but ambiguous and open to interpretation. Para 391 says such development is permitted "adjacent to settlements with development boundaries" while Policy states "adjacent to a development boundary".	Support welcomed.  In practice these slightly different phrases mean the same thing. It is, however, accepted that a minor modification to provide clarity would be helpful.	A minor modification is proposed to ensure a consistent terminology for settlement boundaries is used throughout the plan for clarity
Policy 7.5	Wilson Wraight [19699]	23251	Support	Supports approach to self and custom build. Policy 7.5 complements Policy 5 and 7.4. But question the ceiling.	Support welcomed	No change
Policy 7.5	Prof Murray Gray [14544]	23336	Object	Unclear – 3 or 5 on a single plot or on separate plots  Policy runs counter to international, national and local policies trying to reduce the need to travel by private car and should be deleted. Contrary to NPPF, other policies of the Plan and recent decisions, particularly around accessibility, travel and CO2 emissions. Even where there are services development boundaries tend to be far from them.  Implementation and monitoring problems will result in 3/5 limit being exceeded.	The policy is flexible and could be delivered on one or more sites. It is considered to be clear. The policy gives weight to rural social sustainability.  The policy provides a balanced approach through a ceiling on numbers intended to ensure any detrimental impact including those related to trip generation is minimised.  The SA found the policy to be neutral in most aspects but to have a potentially positive impact on housing provision, efficient use of land and natural resources biodiversity assets, and the local landscape.  Appropriate monitoring will be provided.	No change
Policy 7.5	Trevor Bennett [14599]	23384	Support	The way to increase the number and variety of homes including self-build.	Support welcomed	No change
Policy 7.5	CPRE Norfolk [14427]	23436	Object	Housing need, flexibility and support for rural services already provided for – no need for additional growth.  Promotes generally unsustainable locations. Does not help reduce emissions or mitigate climate change.  If retained, should be greater clarity on how development will respect form and character, and the policy should not apply where there is a made neighbourhood plan.	The policy widens the range of opportunity particularly for SMEs and self-build.  The policy gives weight to rural social sustainability.  The policy provides a balanced approach through a ceiling on numbers intended to ensure any detrimental impact including those related to trip generation is minimised.	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>The SA found the policy to be neutral in most aspects but to have a potentially positive impact on housing provision, efficient use of land and natural resources biodiversity assets, and the local landscape.</p> <p>Impact on form and character will vary site by site and is a typical form of policy wording.</p> <p>It is reasonable for a LP to introduce a new strategic approach that can add to existing, or be reflected in new or revised Neighbourhood Plans.</p>	
Policy 7.5	Noble Foods Ltd [19330]	23529	Object	The policy cannot deliver affordable housing therefore additional allocations are needed.	Sufficient allocations are made to deliver affordable housing. Further affordable rural housing can still be delivered through “exceptions sites”.	No change
Policy 7.5	Robert Gower [19504]	23950	Object	Policy is supported but is unclear. Policy suggests 3 or 5 is the cumulative total, other references suggest it is a limit per site. The latter approach is supported and the policy sets an arbitrary limit that is not evidenced or justified.	<p>No changes are required for soundness but the GNLPA authorities accept that minor modifications could be made for clarity in paras 348 and 379</p> <p>The policy provides a balanced approach through a ceiling on numbers intended to ensure any detrimental impact is minimised.</p>	None (the examination may consider minor clarifications to paras 348 and 379 to be appropriate).
Policy 7.5	Kevin Goodwin [19980]	24151	Object	Allowing development adjacent to a group of dwellings, conflicts with paragraph 79 of the NPPF as recently confirmed in the Courts. These would be considered isolated dwellings in the countryside.	<p>The Court of Appeal recently held that from the government’s evident intention in producing the policy in paragraph 79 of the NPPF, the test for “isolated homes in the countryside” should be remoteness from a settlement <i>(City &amp; Country Bramshill Ltd v Secretary of State for Housing, Communities and Local Government [2021] EWCA Civ 320)</i></p> <p>Policy 7.5 allows for development within or adjacent to a recognisable group of dwellings i.e. a settlement.</p>	None
Policy 7.5	Sequence (UK) Ltd [19983]	24175 24253	Object	<p>Supports the purpose but arbitrary limit is not justified or effective. “First past the post” means development otherwise in accordance with Policy 7.5 and sustainable in all other respects, would be refused. Approach takes no account of the comparative merits of development proposals and sites.</p> <p>Competing schemes in a Parish will create challenges for Development Management and comparisons will be made between sites rather than judging each site on its merits and in accordance with the Local Plan.</p>	<p>The policy provides a balanced approach through a ceiling on numbers intended to ensure any detrimental impact is minimised.</p> <p>It is not unreasonable or unmanageable that the first suitable site or sites that meet the requirements of the Plan will be permitted.</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
				Example sites in Harleston and Horsford.		
Policy 7.5	Pegasus Planning Group [19673]	24181	Object	Policy 7.5 should be the primary source of self-build plots. Priority to self-build should be a specific criterion. The cap should be removed. Removes the need for the requirement for 5% on large plots which will speed up delivery.	Making this Policy the primary source of self-build would restrict choice and delivery options. Self-builders may prefer other locations.  The “positive consideration” in the policy will effectively give priority to self-build where there are competing proposals.  The policy provides a balanced approach through a ceiling on numbers intended to ensure any detrimental impact is minimised.	No change
Policy 7.5	La Ronde Wright [20009] Mrs Nicole Wright [14312]	24317 24358 24427	Object	Overall policy approach to rural areas in 7.4 and 7.5 is too restrictive.  Also “Larger parishes” are highly sustainable and could take more.  Example sites promoted in Sprowston	Policy 7.5 is a less restrictive, innovative approach that provides new opportunities for growth in rural areas where it would previously not be allowed.  Larger settlements generally have allocated or permitted sites and will be more likely to provide opportunities for infill windfall within boundaries.	No change
Policy 7.5	Mrs Nicole Wright [14312]	24360	Object	Policy should include criteria such as preference for brownfield sites, and beauty, quality and design.	Priority to brownfield sites would restrict the flexibility of the policy. Other issues are covered by other policies of the Plan.	No change
Policy 7.5	Mr Richard Bacon [17000]	24380	Object	The GNLP's policies do not reflect the level of demand for self/custom-build and provision should be strengthened	Larger sites are required by Policy 5 to provide 5% of plots for self-build and Policy 7.5 supplements this through “positive consideration” which will effectively give priority to self-build where there are competing proposals.	No change
Policy 7.5	La Ronde Wright [20009]	24450 24478 24488	Object	Too restrictive and therefore conflicts with national policy. Needs to be expanded to deliver larger amounts of growth. Any restriction should be based on a percentage of existing properties. And needs to take account of specific issues in sustainable settlements e.g. sites are proposed for allocation at Ashby St Mary and Thurston, Dickleburgh and Frettenham.	Policy 7.5 is a less restrictive, innovative approach that provides new opportunities for growth in rural areas where it would previously not have been allowed.  Larger settlements generally have allocated or permitted sites and will be more likely to provide opportunities for infill windfall within boundaries  This policy concerns windfall development outside development boundaries and not allocations. Allocations in Ashby St Mary and Thurston and at Dickleburgh are a matter for the SN village clusters plan. The proposed sites in Frettenham are not suitable for allocation.	No change
Policy 7.5	La Ronde Wright [20009]	24482	Object	The policy is unclear in relation to self and custom build. At face value this appears to be a separate element of the policy unrelated to the first part and bullets.	The “positive consideration” in the policy will effectively give priority to self-build where there are competing proposals.	No change

**Policy 7.6 – Preparing for New Settlements**

<b>Policy/ Map/ Para No. Etc</b>	<b>Respondent/s Name &amp; Id Ref</b>	<b>Rep ID/s</b>	<b>Support/ Object</b>	<b>Main Issues Raised</b>	<b>Council Response</b>	<b>Potential Change to Plan</b>
Policy 7.6	Julian Halls [13343]	23341	Object	The requirement /suggestion to build new settlement villages has not been consulted upon in those areas or localities where the intention to provide has been identified	No sites are proposed at this time. Consultation on options will be a key part of the process for the next Local Plan	No change
Policy 7.6	Janet Skidmore (Carter Jonas LLP) [19326]	23509	Object	The timescales for the delivery of new settlements, the viability and deliverability of new infrastructure, and the ability of these types of developments to provide policy compliant levels of affordable housing, should be fully understood and assessed before they are considered as an option for a future GNLP.	Agreed. This will be part of the assessment and optioneering process which will support the next local plan.	No change
Policy 7.6	Noble Foods Ltd (Carter Jonas LLP) [19330]	23530	Support	The timescales for the delivery of new settlements, and the ability of these types of development to provide policy compliant levels of affordable housing, should be fully understood and assessed before they are considered as an option for a future Local Plan.  A strategic scale development is promoted at Marsham.	Support welcomed  Agreed. This will be part of the assessment and optioneering process which will support the next local plan.  Proposal noted.	No change
Policy 7.6	Mr John Hill [15088]	23770	Support	I support this policy and only wish that preparations were more advanced at this time thereby obviating the need to permit less sustainable and more damaging forms of development.	Support welcomed	No change
Policy 7.6	Glavenhill Ltd (Lanpro Services Ltd) [19356]	23811	Support	If a new Garden Village at Hethel is not allocated within this plan period, then policy 7.6 is supported. However, a new Garden Village at Hethel should be allocated now and the choice to not allocate the Stanfield Garden Village within this plan period is a missed opportunity.	Support welcomed.  A new settlement is not needed in this Plan but will be considered in the next as set out under Policy 7.6	No change
Policy 7.6	Historic England [19652]	23975	Object	We strongly advise that sufficient evidence in relation to the historic environment is prepared to inform the choice of new settlement.	Agreed. This will be part of the assessment and optioneering process which will support the next local plan.	No change
Policy 7.6	Brown & Co [12840]	24054	Object	The distribution of growth does not facilitate the transition to a post-carbon economy or to create beautiful places. The Plan seeks to deliver growth through a traditional delivery model which perpetuates inherently inefficient, unsustainable, and uninspiring development. The strategy is ineffective as there is a significant reliance upon sites which have failed to deliver during the current plan period. Insufficient evidence has been provided to demonstrate the ability of these, and other sites, to deliver within this plan period.  A new settlement at Honingham Thorpe should be allocated.	A new settlement is not needed in this Plan but will be considered in the next as set out under Policy 7.6  The distribution of growth in the Plan is considered to facilitate the transition to a post carbon economy.  There is no evidence that new settlements are inherently more beautiful than other forms of development.  Allocated and committed sites are expected to deliver in the plan period and additional evidence	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
					from responses to the Reg19 will demonstrate this. The Plan provides for significantly more dwellings than are required to ensure any fallout of sites does not prejudice meeting the local housing need.	
Policy 7.6	Pigeon Investment Management Ltd [13863]	24073 24098 24127 24234 24271 24283	Object	<p>Policy 7.6 suggests that one or more new settlements will be brought forward in the next Local Plan subject to the outcomes of assessment work. This Policy is unsound as it will be entirely ineffective during the current plan period as the necessary work has not been undertaken.</p> <p>There are a large number of sustainable options for accommodating future growth within the Main Towns and Key Service Villages (as identified within the HELAA) which should be considered, at the very least, alongside any consideration of a new settlement/s. Extension sites at Wymondham, Brundall, Reepham, Hethersett and Diss (2) are promoted.</p>	<p>The policy provides a clear signal that the necessary work will be undertaken. If new settlements are allocated in the next Local Plan then they will deliver some growth before 2038 i.e. in the current plan period. Speed and ability to deliver is likely to be a significant consideration.</p> <p>As with any Local Plan process, other options will be considered.</p>	No change
Policy 7.6	Honingham Parish Council [14400]	24168	Object	<p>The dramatic change and decrease in retail in Norwich provides significant redevelopment opportunities for housing, thereby reducing the need for “garden villages”</p> <p>A wide range of detrimental impacts of the Honingham Thorpe proposal are identified, including destruction of the heritage, culture and rural ambiance, lack of local infrastructure and services, flood risk; lack of jobs and increased commuting.</p>	These issues are all typically considered in Local Plans and will all be taken into account in the assessment of potential new settlements.	No change
Policy 7.6	Breckland District Council [19646]	24232	Object	<p>Breckland District Council has strong reservations about the location and impact of these new settlements and the ability of the infrastructure on Breckland’s communities in the area, as well as the impact on infrastructure-transport, health, power and water. The Council would welcome early discussions on these settlements under the duty cooperate requirement.</p>	<p>No new settlements are allocated in this Local Plan.</p> <p>Engagement with neighbouring authorities will be part of the assessment process.</p>	No change
Policy 7.6	Mr Richard Bacon [17000]	24378	Support	<p>I would like to place on record my support for the proposed new settlement at Hethel (Stanfield Garden Village) ahead of the investigation into new settlement sites later this year. This settlement would provide a self-sufficient, low-carbon community in a vibrant location. The speed of delivery and the availability of both affordable and self/custom-build homes at scale would help address local and national housing needs at pace, providing an innovative and sustainable solution to the current housing crisis, and help meet South Norfolk’s statutory duty to fulfil self-build demand.</p>	Support for this proposal is noted. It will be considered alongside any other proposals in the approach flagged by Policy 7.6.	No change
Policy 7.6	David Lock Associates	24462	Object	<p>Strongly support the inclusion of Policy 7.6, which reflects NPPF requirements for ‘positively-planned growth’ and</p>	Support for Policy 7.6 welcomed.	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
	[20014]			<p>recognises that development pressures are unlikely to diminish over the life of the plan, particularly in the strategic context shaped by the Cambridge Norwich Tech Corridor (CNTC) Vision and Spatial Strategy, and economic growth in this part of the UK relative to Cambridge and the O2C Arc, the government's priority area for global economic growth and Investment</p> <p>A wide range of arguments are made to support the need for a modified policy which should either be (i) a preferred or defined locationally-specific allocation for a new settlement; or (ii) a criteria-based new settlement policy against which to assess any new settlement proposal coming forward; or (iii) include a strengthened timetable in the policy. Option (i) is preferred and Silfield Garden Village is promoted.</p>	The proposed modifications are not required as a new settlement is not needed in this Plan but will be considered in the next as set out under Policy 7.6	

## Appendices

### Appendix 1 – Infrastructure

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Appendix 1	Mr Peter Riseborough [18981]	23400	Object	Objection to the statement regarding capacity for sewage treatment in Aylsham, believe there should be clearer plan to address capacity shortfall before any housing development.	<p>Anglian Water provides water and water recycling infrastructure for the Greater Norwich area.</p> <p>AW's Water Recycling Long Term Plan (2019) identified the need to increase drainage capacity through Sustainable Drainage Systems (SuDS) and upsizing sewers within the Greater Norwich area.</p> <p>The above plan also planned investment to address the growth needs for Acle, Aylsham, Belaugh and Water Recycling Centres. Increased drainage capacity and Combined Sewer Overflow investigations and improvements are included as part of the plan.</p>	No change.
	Mr Peter Riseborough [18981]	23401	Object	Objection to the comments on the health care requirements, believe there is a shortfall of provision in all aspects of health care.	<p>Forward planning in health care is considered a high priority, the Greater Norwich Health Infrastructure Delivery Plan is in the process of being developed.</p> <p>The Health service providers have not objected to the contents of the Plan.</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, 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>	No change
	NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]	23934	object	The summary of police infrastructure requirements should be included in Appendix 1 (with its associated cross reference to Policy 4).	We have not included provisions in the Police Infrastructure Delivery Paper as this was never submitted into the process.	No change
	Hingham Parish Council (Mrs A Doe, Clerk) [12974]	24401	object	Specific reference to Hingham, no infrastructure needs have been identified within the plan, despite the cumulative impacts of development within the town.	The assessment of appropriate scale of growth as being determined as part of spatial distribution, the plan for Hingham is in line with the local infrastructure capacity.	No change

**Appendix 2 – Glossary**

<b>Policy/ Map/ Para No. Etc</b>	<b>Respondent/s Name &amp; Id Ref</b>	<b>Rep ID/s</b>	<b>Support/ Object</b>	<b>Main Issues Raised</b>	<b>Council Response</b>	<b>Potential Change to Plan</b>
Glossary	Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	23976	Object	Soundness objection raised as the glossary does not include definitions for Listed Building and Local List and Registered Park and Garden. Also the definition for Scheduled Ancient Monument should be changed to scheduled monument.	No changes are required for soundness. However, we agree that minor modifications could be made for clarity by including/amending these entries in the glossary.	Minor modification to the glossary to include definitions for listed building, local listed building, registered park and garden. Also amend glossary entry from scheduled ancient monument to scheduled monument.

**Appendix 3 – Monitoring**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Appendices, Appendix 3 Monitoring Framework	Centre for Sustainable Energy (Daniel Stone, Project Manager) [19972]	24528	Object	<p>We note that the GNDP has decided not to use local carbon targets and monitoring as suggested by some consultees to a previous consultation. As it is neither possible nor desirable to set up plan specific monitoring. We do not agree with this analysis.</p> <p>The Planning and Compulsory Purchase Act (section 19) and the NPPF (Paragraph 148 and 149) require Local Plans to be carbon audited and to achieve radical carbon emission reductions in line with the Climate Change Act (upgraded to a -100% requirement by 2050). Without carbon auditing, it is not possible to demonstrate that the plan can achieve radical emissions cuts aligned to the Climate Change Act.</p> <p>The change suggested is that the evidence base should provide an overall carbon budget for the district to 2050, consistent with the updated Climate Change Act. It should show baseline emissions and the impact of development and mitigating policies on this emission curve.</p> <p>Interpretation of the NPPF requirements on climate change is provided by a legal briefing RTPI, TCPA; and Client Earth “Planning for Climate Change – Law and Policy Briefing”</p> <p>Various policy alternatives are suggested from elsewhere in England. Relating to reducing carbon emissions in relation to new buildings, retro-fitting, energy generation, and transport.</p>	<p>The Monitoring Framework as drafted is considered sound without having bespoke carbon auditing at a district level. Monitoring indicator GNLP19 deals with climate change and says: “To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data. The GNLP will support achievement of any objectives or targets identified in adopted local strategies.”</p> <p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that:</p> <ol style="list-style-type: none"> <li>1. National targets regularly change so it is appropriate that GN should contribute to those national targets and those targets are updated when they change prior to adoption;</li> <li>2. Many aspects of national policy which lead to reduced overall carbon emissions are largely beyond the scope of a local plan e.g. the national power mix and trunk road journeys. Carbon emission reductions can however be contributed to by the local plan, such as through requirements for development to be supported by local sustainable energy supplies or the sustainable location of development. The broad ranged approach to addressing climate change through the GNLP is set out in the Climate Change Statement.</li> </ol> <p>More generally on the point about dealing with climate change, the GNLP recognises its upmost importance. 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>	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
					Policies are also drafted with reference to the viability considerations and set in the context of national planning policy. For example, the energy policy for new homes adds £5,000 per property in build costs and reflects the Government's Future Homes Standard consultation of October 2019.	

**Appendix 4 – Plans to be superseded and plans to be carried forward**

<b>Policy/ Map/ Para No. Etc</b>	<b>Respondent/s Name &amp; Id Ref</b>	<b>Rep ID/s</b>	<b>Support/ Object</b>	<b>Main Issues Raised</b>	<b>Council Response</b>	<b>Potential Change to Plan</b>
App 4	Stop Norwich Urbanisation (SNUB) (Mr Stephen Heard) [19735]	23618	Object	Legal and soundness objections raised, and challenge compliance with duty to cooperate: Neighbourhood plans are often ignored or overruled, e.g. Green Lane East, Little Plumstead. Explain plans approved outside of neighbourhood plans.	As Appendix 4 shows, neighbourhood plans do expire, but they have been considered throughout production of GNLP, as evidenced in the site assessment booklets. The site you refer to is not allocated in the GNLP.	No change

**Appendix 5 – Village Clusters in Broadland**

<b>Policy/ Map/ Para No. Etc</b>	<b>Respondent/s Name &amp; Id Ref</b>	<b>Rep ID/s</b>	<b>Support/ Object</b>	<b>Main Issues Raised</b>	<b>Council Response</b>	<b>Potential Change to Plan</b>
Appendix 5	Carter Jonas LLP (Brian Flynn) [12669] on behalf of Noble Foods Ltd [19330]	23531	Support	The approach of directing 35 additional dwellings to Marsham is supported however as set out in other representations there are significant constraints associated with the proposed allocation and site GNLP3035 is promoted as an alternative allocation	Support for appendix 5 noted. See other parts of the plan in relation to the objection to site GNLP2143 and the alternative proposal of site GNLP3035.	No change

**Appendix 6 – Housing Trajectory**

Policy/ Map/ Para No. Etc	Respondent/s Name & Id Ref	Rep ID/s	Support/ Object	Main Issues Raised	Council Response	Potential Change to Plan
Appendices, Appendix 6 Housing delivery trajectory	CODE Development Planners Ltd (Mr Mike Carpenter, Director) [19647]	24065	Object	<p>The GNDP at the publication stage and earlier stages of the plan preparation process has chosen not to set out the anticipated rate of development for specific sites and thereby test the robustness of assumptions made about the delivery of committed and allocated sites.</p> <p>The village clusters plan is divorced from the GNLP both in its assessment and consideration of sites and in the timing of its publication and examination. Therefore, no opportunity exists to whether or not 1,200 homes of the assumed housing delivery are deliverable or developable as defined by paragraph 67 of the Framework.</p>	<p>The housing trajectory is prepared with a thorough understanding of recent completions, existing commitments, and anticipated housing delivery in future years. The preparation of the housing trajectory is consequently considered sound.</p> <p>However, the anticipated supply of homes continues to be kept up to date by the GNLP team and colleagues within the Greater Norwich authorities. This information, on a site-by-site basis, will be available to the inspector for examination. Also, at the time of writing the South Norfolk Village Clusters Plan is being consulted on and so by the time of examination a detailed understanding of the sites to be allocated in this document will be available.</p>	No change