

Greater Norwich Local Plan (GNLP)

Plans Team, The Planning Inspectorate
Via email
plans.admin@planninginspectorate.gov.uk

30 July 2021

Dear Planning Inspectorate

Submission of the Greater Norwich Local Plan

I write to confirm that Broadland District Council, Norwich City Council and South Norfolk Council, working together as the Greater Norwich Development Partnership (GNDP), are submitting their joint local plan, the Greater Norwich Local Plan (GNLP), in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended).

The GNLP sets out the planning strategy for growth in Greater Norwich from 2018 to 2038 and the planning allocation policies for the sites to deliver the strategy. The plan is for Greater Norwich as a whole, however some of the requirement will be met by a separate South Norfolk Village Clusters Housing Allocations Plan and does not form part of this submission.

The submitted documents are listed in Appendix A to this letter and are being transferred to you by WeTransfer. Please note that the following documents provide updated information for the examination and have only recently been finalised, so have not been available publicly previously:

- Greater Norwich Local Housing Needs Assessment (Ref B22.3)
- Supplementary appendix to the 2020 Viability Appraisal (B26.5)

Please note that we aim to send a suite of topic papers at the beginning of September, to further aid the Inspector's considerations.

Attached at Appendix B is a document which sets out the potential main issues for the examination.

Attached at Appendices C & D are schedules of proposed minor changes to the Greater Norwich Local Plan. Whilst the changes listed have not been subject to consultation, the councils consider that they are of a minor nature, reflecting updated data or other changes in circumstances since the Plan was published, or other editorial changes, including, for example, correction of typographical or factual errors. We anticipate that these may change further during the examination.

Attached at Appendix E is a schedule of not duly made, general and late representations which we have submitted for completeness.

In accordance with Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended), the councils formally request that the appointed Inspector

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recommends such modifications to the Greater Norwich Local Plan as may be necessary to ensure legal compliance and soundness.

The councils also request, under paragraph 74 of the National Planning Policy Framework, for the Inspector to confirm the five-year land supply position on adoption.

The councils have appointed Mrs. Annette Feeney to be the independent Programme Officer for the examination. Her contact details are:

annette.feeney2@norfolk.gov.uk and her telephone number is 07775 771026.

Mrs. Feeney has collected hard copies of the Greater Norwich Local Plan and Submission Policies Maps and these will be sent on to the appointed Inspector.

On the basis that the Local Plan contains both strategic and non-strategic policies and given the matters within the plan to be considered, the councils estimate the duration of the hearing sessions part of the examination process may need to last approximately three weeks. The councils would suggest a preferred timescale for the opening of the hearings of around November/December 2021. We anticipate some 128 people wishing to participate.

Yours sincerely

Mike Burrell
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Appendix A

List of core submission documents

Reference	Document title	Date	Author
A1	Greater Norwich Local Plan Pre-Submission Draft Strategy	December 2020	GNLP
A2	Greater Norwich Local Plan Pre-Submission Draft Part 2 Sites Plan	December 2020	GNLP
A3	Submission Policies Map - Broadland	June 2021	GNLP
A4	Submission Policies Map - Norwich	June 2021	GNLP
A5	Submission Policies Map - South Norfolk	June 2021	GNLP
A6.1	Sustainability Appraisal & Strategic Environmental Assessment – Volume 1 – Non-technical summary	January 2021	Lepus Consulting
A6.2	Sustainability Appraisal & Strategic Environmental Assessment – Volume 2 – Regulation 19 Sustainability Appraisal Report	January 2021	Lepus Consulting
A6.3	Sustainability Appraisal & Strategic Environmental Assessment – Volume 3 – Appendices	January 2021	Lepus Consulting
A6.4	GNLP response to Reg. 19 SA Report	January 2021	Lepus Consulting
A7	Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan	July 2021	The Landscape Partnership
A8.1	Statement of Consultation	June 2021	GNLP
A8.2-A8.21	Appendices to the Statement of Consultation	June 2021	GNLP
A9	Duty to Cooperate Statement – Draft	July 2021	GNLP
A10	Equalities Impact Assessment	December 2020	GNLP
A11	Representations on the Pre-Submission Greater Norwich Local Plan – in document order	July 2021	GNLP
A12	Representations on the Pre-Submission Greater Norwich Local Plan – in respondent order	July 2021	GNLP
A13	Planning Inspectorate Submission Letter	July 2021	GNLP
A14	Notice of Regulation 22 Submission	July 2021	GNLP
A15	Broadland District Council Local Development Scheme	December 2020	Broadland District Council
A16	South Norfolk Council Local Development Scheme	December 2020	South Norfolk Council
A17	Local Development Scheme for Norwich	February 2021	Norwich City Council

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A18.1	Statement of Community Involvement for Broadland	February 2019	Broadland District Council
A18.2	Statement of Community Involvement for Broadland - temporary update	July 2020	Broadland District Council
A19	Statement of Community Involvement for Norwich	September 2020	Norwich City Council
A20.1	South Norfolk Statement of Community Involvement	September 2020	South Norfolk Council
A20.2	South Norfolk Statement of Community Involvement - temporary update	July 2020	South Norfolk Council

List of supporting evidence and information for submission

	Site assessment booklets		
B1.1	Site assessments booklets Introduction and Methodology	December 2020	GNLP
B1.2 – B1.13	Norwich and Urban Fringe booklets: Norwich; Colney; Costessey; Cringleford; Drayton; Easton and Honingham; Hellesdon; Rackheath; Sprowston; Taverham and Ringland, Thorpe St Andrew; Trowse.	December 2020	GNLP
B1.14 – B1.18	Main Towns booklets: Aylsham; Diss; Harleston; Long Stratton; Wymondham.	December 2020	GNLP
B1.19 – B1.27	Key Service Centres booklets: Acle; Blofield; Brundall; Hetherset; Hingham; Loddon and Chedgrave; Poringland; Reepham; Wroxham.	December 2020	GNLP
B1.28 – B1.47	Village Clusters booklets: Blofield Heath; Buxton with Lamas; Cantley; Cawston; Coltishall and Horstead; Foulsham; Freethorpe; Frettenham; Great & Little Plumstead; Hainford; Hevingham; Horsford; Horsham St Faith; Great Witchingham; Lingwood & Burlingham; Marsham; Reedham; Salhouse; South Walsham; Spixworth.	December 2020	GNLP
B1.48 – B1.51	Non-residential booklets: Urban Fringe; Main Towns; Key Service Centres; Villages.	December 2020	GNLP
B1.52 – B1.57	Site assessment booklets Appendix A – Tables of Allocated Sites with reasons for allocations	December 2020	GNLP
B1.58 – B1.63	Site assessment booklets – tables of Unallocated Sites with reasons for rejection	December 2020	GNLP

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	<i>Duty to Cooperate</i>		
B2.1	Duty to Cooperate – Planning in Health Protocol	August 2019	
B2.2	Duty to Cooperate – Norfolk Strategic Planning Framework	June 2019	NSPF
B2.3	Duty to Cooperate – Norfolk Strategic Planning Framework	May 2021	NSPF
	<i>Employment, Town Centres & Retail</i>		
B3.9	Greater Norwich Town Centres & Retail Study update	December 2020	Avison Young
B3.10	Economic Land Assessment Addendum 2020	November 2020	Avison Young
B3.11	GNDP Briefing report on updated economic evidence	December 2020	GNLP
	<i>Energy Infrastructure</i>		
B4.1	Greater Norwich Energy Infrastructure Study	May 2019	Egnida Consulting
	<i>GIRAMS Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy</i>		
B6.1	GIRAMS Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy - Habitats Regulations Assessment Strategy Document - draft subject to approval by the Norfolk Strategic Planning Group	March 2021	Place Services
B6.2	GIRAMS Interim Statement of Common Ground Greater Norwich Authorities and Natural England	July 2021	
	<i>Gypsies, Travellers and Travelling Show People Accommodation Needs Assessment</i>		
B8.1	Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Show People Final Report	October 2017	RRR Consultancy Ltd
B8.2	Greater Norwich Accommodation Need and Supply changes Since the Accommodation Needs Assessment 2017 (ANA)	January 2021	RRR Consultancy Ltd
	<i>Infrastructure Needs</i>		
B12.2	Greater Norwich Local Plan Infrastructure Needs Report	December 2020	GNLP
	<i>Strategic Flood Risk Assessment</i>		
B21.6	Strategic Flood Risk Assessment (SFRA) Level 2 report	February 2021	JBA Consulting
	<i>Strategic Housing Market Assessment (SHMA)</i>		

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B22.1	Strategic Housing Market Assessment (SHMA)	June 2017	Opinion Research Services
B22.2	Strategic Housing Market Assessment (SHMA) Supplementary Note	June 2017	Opinion Research Services
B22.3	Greater Norwich Local Housing Needs Assessment	June 2021	Opinion Research Services
	<i>Viability Study</i>		
B26.3	GNLP Viability Appraisal	December 2020	NPS Group
B26.4	Viability Appraisal Appendices (Dec 2020)	December 2020	NPS Group
B26.5	Supplementary Appendix to the 2020 Viability Appraisal	May 2021	NPS Group
	<i>Water Cycle Study</i>		
B27.4	Greater Norwich Water Cycle Study Final	March 2021	AECOM

Appendix B

Potential Issues for the Examination

1. The content of this appendix is largely derived from reports considered by Greater Norwich members prior to submission of the plan, including the report to the Greater Norwich Development Partnership (GNDP) which is available [here](#). The report provides additional context to this appendix.
2. The GNDP report set out the main issues raised through the Regulation 19 stage of plan-making and concluded that the representations identified no significant issues, in principle, that could not be addressed or are such a risk to the GNLP that it should not be submitted for examination. The recommendation provided the caveat that submission of the plan should be subject to progress being made on key issues relating to protected habitats and Gypsy and Traveller sites. These matters have since been progressed.
3. Overall, 1,316 representations were made at the Regulation 19 stage on the plan (263 support and 1,053 objections). Appendix 1 of the GNDP report provides information on the numbers of representations made in relation to different policies. Appendix 2 of the GNDP report provides a concise summary of the main issues raised through the representations. It is broadly organised on a policy and thematic basis, though in some cases organisations are named for clarity. A more detailed summary of representations made by different individuals and organisations, which is part of the Statement of Consultation to accompany submission of the plan, and which includes officer responses to the representations, is available [here](#). The full representations made, without officer responses, are available from the GNLP website [here](#).
4. A number of issues raised through representations are being addressed on an ongoing basis. These include issues on which agreement has been made, or common ground identified with some outstanding elements to be debated at examination. Table 1 below sets out ongoing work of this type:

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Issue	Ongoing work
Duty to Cooperate (D to C)	<p>The D to C covers strategic scale cross-boundary issues between councils, infrastructure providers and organisations such as the Environment Agency, Historic England and Natural England.</p> <p>More local issues have been raised in some of the representations to the GNLP in relation to the D to C, which in most cases relate to concerns over the consultation process, which is different from the D to C.</p> <p>For Greater Norwich, the Norfolk Strategic Planning Framework (NSPF) provides a series of agreements through its regularly updated Statement of Common Ground which addresses strategic D to C cross-boundary issues.</p> <p>In addition, a commitment to future joint work on more specific cross-boundary issues is being agreed with Breckland District Council on water, power and economic synergies through a specific Statement of Common Ground.</p> <p>The Habitats Regulation Assessment (HRA) identifies the need for measures to be provided to avoid impacts on European status wildlife sites. The GNLP makes provision for such measures. A Statement of Common Ground is being produced with Natural England on their representations and including this issue.</p> <p>The Duty to Cooperate Statement submitted with the GNLP provides further detail.</p>
Gypsies and Travellers	<p>No sites have been submitted through the plan-making process to address evidenced need. While policy 5 (Homes) provides a criteria-based policy for assessing applications, the authorities are proactively engaging with existing families/site owners to explore the potential for acceptable expansion of existing sites through the development management process and continuing to explore options to find suitable land in public ownership on which to bring forward a site or sites.</p>
Minor modifications	<p>Minor modifications to the text of the plan have been submitted (see appendices B and C below) mainly to address representations from Historic England, Natural England, the Environment Agency and Anglian Water. These largely relate to the Vision and Objectives, policies 2 (Sustainable Communities), 3 (Environmental Enhancement) and 4 (Infrastructure), as well as a number of site allocations. Other proposed minor modifications cover the limited number of errors identified. Further minor modifications may be proposed to reflect the passage of time as we move through the examination.</p>

5. In the light of the representations made, national policy/guidance and experience of previous examinations, it is considered that the key issues for the plan's examination are most likely to be:
 - a. The overall housing numbers;
 - b. The locations and deliverability of growth, including site viability and site-specific issues;
 - c. The impact of the strategy on climate change;
 - d. Appropriate measures to meet the needs of Gypsies and Travellers given the lack of sites submitted for allocation up to now.

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6. Table 2 below provides officer summaries giving a broader overview of potential issues for the examination based on the representations that have been made, with officer responses in relation to these issues. As set out above, appendix 2 of the GNDP report provides further detail of the representations, with full representations available [here](#).

Table 2

A.Process Issues		Officer Response
Site Selection	<p>The process has been questioned at different levels of the hierarchy, including:</p> <ol style="list-style-type: none"> 1. the role of Sustainability Appraisal (SA) e.g. for sites on the edge of Hellesdon in Horsford parish, with a legal view submitted questioning site selection soundness; 2. Aylsham (the inclusion of an additional site at the Regulation 19 stage – see below); 3. Key Service Centres (particularly site selection in Hingham); 4. Village Clusters (the site selection process involving school catchments has been questioned). 	<p>In relation to representations on the process of plan-making, there is confidence that the approach that has been taken is sound. This includes site selection, the use of SA, the Duty to Cooperate and the consultation process overall, including the increase in housing numbers and consequent inclusion of additional sites at the Regulation 19 stage (see below).</p> <p>The role of the SA in site selection and the wider process used in assessing sites have been clearly set out and recorded, with criteria which reflect national planning policy, county-wide and local priorities provided to guide that selection. The introductory section of the Sites Plan explains the process which was followed, and settlement booklets identify why the sites were selected in each settlement.</p>
Dependent plans	<p>The role and timing of the South Norfolk Village Clusters Housing Allocations Plan (including evidencing the amount of growth), along with the Diss and area Neighbourhood Plan's role in allocating sites has been questioned.</p>	<p>There is flexibility in how Local Plans are produced so that they can be either single or multiple volume documents. In addition, Neighbourhood Plans can allocate sites. The emerging village clusters plan in South Norfolk, which is currently being consulted on, provides evidence that the growth required by the GNLP can be provided for in sustainable locations.</p>
Changes from Regs 18 to 19 (lack of Reg	<p>1) The lack of consultation on both the overall numbers and additional sites/increased numbers has been criticised (this has particularly been</p>	<p>The 2012 Planning Regulations anticipate that there will be changes in whatever has been consulted upon after the Regulation 18</p>

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<p>18D consultation)</p>	<p>raised in relation to Acle, Aylsham, Horsham St. Faith and Lingwood);</p> <p>2) The inability to comment on and change settlement boundaries has been raised.</p>	<p>consultation. It is very common for new sites to be proposed for allocation for the first time at the Regulation 19 stage either because they have only recently become available or the local planning authority needs to supplement its allocations in order better to meet needs.</p> <p>At the Regulation 18C draft plan stage of the GNLP, overall housing numbers were consulted on, alternative sites were consulted on as well as those proposed for allocation, and new sites were submitted.</p> <p>The system of plan preparation would be rendered very inflexible if such changes required a further regulation 18 consultation.</p> <p>The decision to not include revisions to settlement boundaries in the plan resulted from the timetable changes stemming for the release of the “Planning for the Future” white paper. Amendments will be possible through any future review of development management policies.</p>
<p>B.Plan content</p>		
<p>Overall housing growth</p>	<p>Representations from different organisations and individuals state opposite views that the plan provides for:</p> <ul style="list-style-type: none"> • Too little housing growth (it doesn't reflect economic aspirations and there is questioning of the methodology re. housing numbers); • Too much growth (housing need + a 5% buffer is sufficient, insufficient account has been taken of climate change, with the South Oxfordshire plan referenced as a plan challenged on the scale of growth in relation to climate change). <p>Also -</p> <p>a) Windfall – a greater or lesser focus should be placed on windfall in calculating housing numbers, and policy 7.5 is considered unworkable;</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>

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	<p>b) Contingency – more contingency sites are required versus none are needed.</p>	<p>The challenge to the South Oxfordshire plan concerning the scale of growth and its climate change impacts was unsuccessful. Meeting housing need was identified as a key consideration as well as addressing climate change as plans need to provide for economic, social and environmental sustainability.</p> <p>The approach to windfall, which allows for some of the likely delivery to be included as part of overall housing provision, is considered appropriate. As windfall delivery is likely to remain robustly high, it is appropriate to include a limited proportion as part of total potential delivery.</p> <p>One contingency site is included should this prove to be required due to low delivery of allocated housing sites.</p> <p>The 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 if this were to occur.</p>
5-year land supply	<p>Representations (from some in the development industry) question the proposed approach to the 5-year land supply which is based on the housing need identified through the standard methodology without including the buffer.</p>	<p>The figure of 49,492 is potential housing delivery during the plan period, not the housing need. The need is 40,541, calculated using the standard methodology. The latter is proposed to be used to calculate 5-year housing land supply.</p>
The location of growth	<p>1) Settlement hierarchy</p> <p>i) Suggested changes (all to include more growth in specific locations):</p> <p>(1) Wymondham should be a Large Main Town;</p> <p>(2) Mulbarton, Scole and Horsford should be Key Service Centres (KSCs);</p> <p>(3) A separate countryside category is needed.</p> <p>ii) The amount of growth in different parts of the hierarchy:</p>	<p>1) The Settlement Hierarchy, which is based on evidence of the services available in different settlements, is considered to be appropriate. Open countryside is in the village clusters level of the hierarchy.</p> <p>The overall growth strategy, including housing and jobs numbers and locations, is considered to be well-evidenced and to meet the plan's objectives. This will be achieved by focussing the great majority of</p>

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	<p>(1) More vs. less in the urban area (sustainability + availability of sites from city centre decline vs. deliverability and market saturation issues), over reliance on Strategic Regeneration Areas with limited evidence (East Norwich and Northern City Centre) and the North East Growth Triangle.</p> <p>(2) More/less growth in towns (less in Aylsham, more in Wymondham and Diss, new sites needed in Long Stratton).</p> <p>(3) More/less growth in KSCs – different views with focus on more in Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham vs. less in Reepham and a different site in Hingham;</p> <p>(4) More/less growth in village clusters.</p> <p>2) The lack of a Green Belt has been criticised;</p> <p>3) New Settlements – there has been questioning of the lack of inclusion of new settlements, whilst an alternative view stated is that policy 7.6 should not prejudice the next plan;</p> <p>4) The Cambridge Norwich Tech Corridor (CNTC) should be a greater focus for growth;</p> <p>5) Undeliverable sites with no promoter or developer should not be in the plan.</p>	<p>growth in the Norwich urban area and in and around the towns and larger villages, thus reducing the need to travel and addressing climate change impacts. At the same time, the strategy allows for some growth in and around smaller villages to support local services. The strategy maximises the potential of brownfield land and accessible greenfield sites. The strategy also offers a range of types and locations of sites which will help to ensure that the broad range of housing needs of our communities are met, enhancing delivery of the housing by providing opportunities for a range of house providers.</p> <p>2) 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 for the future would reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.</p> <p>3) The GNLP does not allocate any of the proposed new settlements as there are considered to be enough sites to meet needs in and around existing settlements. The strategy takes account of the Government's proposed changes to the planning system, with policy 7.6 setting out the intention to bring forward a new settlement or settlements through the next strategy and sets out a timetable for that work.</p> <p>4) Forming part of the defined Strategic Growth Area, the CNTC is a major growth focus. Due to high levels of existing commitment in locations such as</p>
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		<p>Wymondham, Hethersett, Cringleford and Easton which are already strategic locations for growth, only limited additional housing numbers have been added in these locations in this plan.</p> <p>5) Evidence has been submitted showing that undeliverable sites have not been allocated in the plan.</p>
Sites subject to significant/most representations	<ol style="list-style-type: none"> 1) East Norwich (the main concerns are over capacity and deliverability, including from Historic England); 2) Anglia Square (the policy should be amended to reflect recent changed intentions concerning the site); 3) The UEA Grounds Depot (the allocation should be deleted as the Yare Valley is a priority Green Infrastructure corridor); 4) Aylsham (the main concerns are over the process of adding a further site at the Regulation 19 stage and over infrastructure capacity in the town); 5) Hingham (the main concern is over site selection); 6) The Showground (the main concern is over transport capacity); 7) Lingwood (the main concern is over the site selection process adding a new site at the Regulation 19 stage); 8) Foulsham (the main concern is over an historic hedgerow). 	<p>Concerns over specific sites and locations for growth are likely to be a key part of the examination. As set out above, officers are confident that the site selection and plan-making process raised in relation to some locations has been sound.</p>
Transport	<p>The Norwich Western Link (NWL) should not be in plan, there is insufficient focus on walking, cycling and other sustainable transport and too much focus on aviation.</p>	<p>Although it is not a specific plan proposal, the inclusion of the NWL road reflects its progress by Norfolk County Council as an infrastructure priority, with a Preferred Route announcement made in July 2019. This applies to other improvements to transport including to the airport, rail services, trunk and primary roads and measures to promote active and sustainable transport which are also included in the GNLP.</p>
Climate change	<p>There is insufficient coverage of climate change issues which should be the basis of the plan. This includes:</p> <ol style="list-style-type: none"> 1) the amount, distribution and timing of growth; 2) inadequate targets and monitoring; 	<p>The climate change statement in the GNLP strategy sets out and justifies the broad ranging approach the plan takes to tackling climate change.</p>

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	<p>3) an inadequate approach to energy and water efficiency and flood risk;</p> <p>4) the lack of coverage of the Norfolk Strategic Planning Framework (NSPF) priorities for local plan policies to address climate change.</p>	<p>The strategy focusses the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and helping to address climate change impacts. It also allows for some growth in and around smaller villages to support local services, the loss of which would generate the need for more journeys.</p> <p>The overall housing numbers in the plan 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.</p> <p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that national targets regularly change so it is appropriate that Greater Norwich should contribute to those national targets. Thus, targets will be updated locally when they change nationally, as with changes made by the government in 2021.</p> <p>The GNLP contains policies which cover all relevant aspects of the 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 have been 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,</p>
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		sustainable drainage, overheating and green infrastructure.
Infrastructure	Provision is insufficient to support growth (especially for health and schools).	Appendix 1 of the GNLP Strategy sets out the infrastructure required to serve growth. It is based on evidence collected in the GNLP Infrastructure Needs Report. This has been produced by working with the relevant infrastructure providers, including Norfolk County Council for schools and health care providers for health facilities, so is the best available information to provide a planned approach to meeting growth needs. Updates will be made on an ongoing basis if and when circumstances change.
Housing	<ol style="list-style-type: none"> 1) Affordable housing (AH) – the policy would over-deliver against need, there should be no AH requirement on student developments; 2) The accessible homes and space standard requirements are not evidenced; 3) Elderly needs should be covered by more allocations, not just general policy support; 4) Self /Custom build shouldn't be a fixed percentage. 	<ol style="list-style-type: none"> 1) The homes policy is well evidenced. The affordable housing targets are based on evidence of need and have taken account of viability. Affordable housing is required on student accommodation away from UEA. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address wider affordable housing needs. 2) The standards set for accessible and adaptable homes are also based on evidence of need and have taken account of viability. 3) 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. 4) Promotion of self/custom build is a government priority. The requirement for at least 5% of plots on sites of 40 dwellings plus will support their delivery. It will not be applied if lack of need on specific sites can be evidenced.
Evidence	Questioning of: <ol style="list-style-type: none"> a) The validity of the Viability study; b) The Habitat Regulations Assessment (HRA) (and Water Cycle Study); 	All evidence, including the Viability Study, HRA and SA has been produced by appropriate and experienced professional

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	<ul style="list-style-type: none"> c) The Statement of Consultation and lack of compliance with the South Norfolk Statement of Community Involvement; d) Sustainability Appraisal (SA) <ul style="list-style-type: none"> I. Non assessment of reasonable and strategic alternatives; II. Flawed assessment of specific sites; III. Supports a different strategy (there should only be limited new development in the KSCs and villages); IV. Inclusion of a contingency site is not justified; V. Carried forward sites have not been treated comparably with others; 5) Inadequate on carbon assessment and addressing climate change. 	<p>consultancies using the approaches required by government. As such, the evidence is considered to be robust. Discussions on the evidence base and how it has assisted in forming policy are likely to be an important part of the examination.</p> <p>The process of plan-making, which has included three stages of Regulation 18 consultation, is considered to have complied with requirements.</p>
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Appendix C

Schedule of Minor Modifications to the GNLP Strategy

This schedule sets out minor modifications to the Greater Norwich Local Plan (GNLP) Strategy following the Regulation 19 Publication Stage and the revisions made to the NPPF in July 2021. The changes it includes are not considered to be needed to make the plan sound or legally compliant. Instead, they consist mainly of minor modifications to supporting text in the strategy to provide clarification, updates and corrections or errors, mainly in response to representations made at the Regulation 19 stage of plan-making. The schedule also includes a limited number of minor changes to policies. However, none of these are considered to be substantive changes which would constitute main modifications.

Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Foreword 5 th para.	To provide an update partly in response to representation 24200.	Change first clause of the fifth paragraph to read: The Government is consulting on has consulted on changes to the planning system
Foreword 7 th para.	To provide clarification partly in response to representation 24200.	Amend the first sentence of the seventh paragraph to read: This plan identifies where growth is needed from 2018 to 2038, with Government targets leading to around 49,500 new homes being required provided for .
Introduction para. 4	To provide an update removing references to transitional arrangements to reflect changed circumstances.	Change para. 4 to: This plan has been prepared under transitional arrangements ahead of the likely 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 plan produced under the new planning system within a very few years of its adoption.
Introduction footnote 3	To provide an update removing references to transitional	Change footnote 3 to:

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	arrangements to reflect changed circumstances.	The commitment to a new system of local plan making was made through the “Planning for the Future” white paper in August 2020. 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. Whatever the content of the final transitional arrangements for new local plans and the timing of the adoption of the GNLP, it is thus very likely to be superseded within a few years of adoption.
Introduction paras. 17/18	The potential for a minor modification (most likely after para. 17) to better explain how the GNLP inter-relates to the East Marine Plans is being investigated with the Marine Management Organisation.	
Profile Table 1	To provide an update (if 2021 census figures are available before plan adoption).	If available during the plan’s examination, minor modifications should be made to update the table with 2021 census data for populations of the largest settlements in Greater Norwich.
Profile Table 1	To correct an error noted by officers.	Include Mulbarton in the population of largest settlements table (between Brundall and Blofield) with its 2011 population of 3,521 (or the 2021 census figure if available).
Profile paragraph 107	To provide clarity at the request of Historic England (rep. 23956).	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 and historic landscape character, as defined in assessments , add further layers to this historic character. It is important that the plan has policies to protect and enhance heritage, including heritage at risk.
Profile, paragraph 109	To provide clarity at the request of Natural England (rep. 24470).	Add a sentence at the end of para. 109 to read: It is also important that locally designated habitats are protected and enhanced.

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Profile paragraph 112	To provide clarity at the request of the Environment Agency (rep. 23778).	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, enhancing natural capital and assisting the natural functioning of ecosystems , combating climate change, reducing pollution, helping to create attractive homes and workplaces, enhancing landscapes, reducing flood risk and aiding active lifestyles and wellbeing.
Profile para. 115	To provide clarity at the request of the Environment Agency (rep. 23779).	Amend the first sentence of para. 115 so that it reads: Overall, the plan should promote the protection, enhancement and delivery of a network of habitats and a strategic green infrastructure network which addresses the scale of development proposed in the plan.
Vision and Objectives para. 125	To provide clarity at the request of Historic England (rep. 23957) and Natural England (rep. 24514)	Change the final sentence of para. 125 to: Growth will make the best of Greater Norwich's distinct built, natural and historic assets environment, including protecting and enhancing them.
Vision and Objectives para. 143	Subject to evidence of what infrastructure is needed being made available, a potential modification to include reference to Norfolk Constabulary infrastructure could be made in response to rep. 23932 from NPS Property Consultants.	A reference to Norfolk Constabulary could be added to para. 143 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, Norfolk Constabulary and local health care providers. Infrastructure will be delivered through:
Vision and Objectives para. 145	To provide clarity at the request of the Environment Agency (rep. 23781).	Add wording at the end of paragraph 145 so that it reads: Greater efficiency in water and energy usage will minimise the need for new infrastructure, and further reductions in carbon emissions will be delivered

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		through the increased use of sustainable local energy sources. New water efficient buildings will also contribute to the protection of our water resources and water quality, helping to ensure the protection of our rivers, the Broads and our other wetland habitats. 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.
Vision and Objectives para. 147	To provide clarity at the request of Historic England (rep. 23958) by including a reference to landscape characteristics and a further reference to green infrastructure.	Amend paragraph 147 to read: This GNLP will protect and enhance the distinctive local characteristics of our city, towns and villages and their separate identities. The distinctive characteristics of our landscapes will also be protected and enhanced. This will be achieved by shaping high quality, well designed and beautiful new development with green infrastructure in appropriate locations , with homes large enough to provide for a good quality of life.
Vision and Objectives para. 150	To provide updates to include new government greenhouse gas emission targets currently going through parliament which the GNLP will seek to assist to implement.	Change para. 150 to Critically, our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national target to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and the zero-emission target by 2050.
Vision and Objectives para. 151 Environment Objective	To provide updates to include new government greenhouse gas emission targets currently going through parliament which the GNLP will seek to assist to implement.	Change the Environment Objective to Environment: 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 reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and to achieve net zero greenhouse gas emissions by 2050.
Paragraph 156 supporting the	To include reference to the coverage of climate change policies in local plans in the	Amend paragraph 156 to read:

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Climate Change Statement	recently agreed Norfolk Strategic Planning Framework (NSPF) 2021.	<p>The NPPF requires local plans such as this one to “Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts” and to set strategic policies which address climate change mitigation and adaptation.</p> <p>In addition, the NSPF 2021 sets out how local plans in Norfolk should address climate change. The GNLP contains policies which cover all relevant aspects of the NPPF and NSPF including the location of development, access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.</p>
Climate Change Statement Table 5	To provide updates to include new government greenhouse gas emission targets currently going through parliament which the GNLP will seek to assist to implement.	<p>Change the GNLP Coverage column in the final row of the Climate Change Statement to</p> <p>Our ambition is to reduce per capita emissions and thereby contribute to meeting the national targets to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and bring all greenhouse gas emissions to net zero by 2050.</p>
Climate Change Statement Footnotes 51 and 76	To provide updates to include new government greenhouse gas emission targets currently going through parliament which the GNLP will seek to assist to implement.	<p>Amend the link in the footnotes to</p> <p>https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035</p>

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<p>Policy 1 Sustainable Growth Strategy Para. 158</p>	<p>To provide greater clarity on the purpose of the GNLP strategy in response to recent amendments to the NPPF (particularly the revised presumption in favour of sustainable development), and in response to rep 23425 from CPRE Norfolk.</p>	<p>Amend paragraph 158 to read:</p> <p>This 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.</p>
<p>Policy 1 Sustainable Growth Strategy Para. 161</p>	<p>To provide greater clarity on the purpose of the GNLP strategy in response to recent amendments to the NPPF (particularly the revised presumption in favour of sustainable development), and in response to rep 23425 from CPRE Norfolk.</p>	<p>Move para. 161 above paras. 160 and 159 and amend to:</p> <p>Achieving sustainable development is at the heart of the planning system. This means striving to meet social, economic and environmental needs to provide a good quality of life for existing and future generations. As required by the NPPF, the strategy aligns growth and infrastructure needs with the main focus on the strategic growth area. It makes the best use brownfield sites in the city, provides sustainable urban extensions and supports vibrant towns and villages. It will also improve the environment, including mitigating climate change and adapting to its effects. The aim is to retain and enhance the distinctive qualities of Greater Norwich and create environmentally sustainable, resilient and socially inclusive communities. Therefore, as required by the NPPF, policy 1 promotes sustainable development.</p>
<p>Policy 1 Sustainable Growth Strategy Paragraph 166 Footnote 53</p>	<p>To update the plan as the reference to transitional arrangements is now out of date.</p>	<p>Amend footnote 53 to read:</p> <p>Government consultations in autumn 2020 pointed to significant reforms to the planning system, including to the form and role of local plans, and strongly suggest that additional housing growth will be needed in the next review of the</p>

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		plan. As set out in paragraph 4, this plan is being progressed under transitional arrangements provided by government as part of the reforms.
Policy 1 Paragraph 180	To make a correction in response to rep. 23429 from CPRE Norfolk.	Correct the figure in the final sentence of paragraph 180 so that it now reads: These 4,400 1,450 homes are included in the allocations in Row D.
Policy 1	To provide greater clarity by including cross references to policies 2, 3 and 4 in policy 1. This is in response to rep. 24471 from Natural England.	Add cross references in the final sentence of policy 1 in relation to infrastructure provision, including green infrastructure, so that it reads: The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services as set out in policies 2, 3 and 4.
Paragraph 198	To place a greater focus on the plan promoting beautiful, safe and distinctive development in line with the focus on this in a number of sections of the July 2021 NPPF.	Amend the final clause of the paragraph to read: the policy promotes beautiful, distinctive , well-designed and safe places as required by section 12 of the NPPF.
Policy 2 Sustainable Communities Table 8 Issue 3	To provide greater clarity by adding text to table 8 which supports policy 2. The changes reflect and do not change plan policy requirements in relation to green infrastructure provision so are regarded as minor modifications. This change is in response to rep. 24473 from Natural England.	Amend explanatory text, removing a comma and adding further text at the end of the paragraph: Developments are required to provide on-site green infrastructure appropriate to their scale and location. The three main benefits of green infrastructure: biodiversity gain; the promotion of active travel and the reduction of flood risk, are key NPPF priorities. On-site provision will link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4, which has now been in

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		<p>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.</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. The aim is to provide an overall strengthening of green infrastructure networks, which will entail avoiding loss or severance and the enhancement of existing green infrastructure networks, as well as creating new elements.</p>
Policy 2 Section 3	To provide a minor modification to the policy to reflect the content of the revised NPPF 2021 (paragraph 131).	<p>Amend section 3 of the policy to:</p> <p>3. Contribute to multi-functional green infrastructure links, including through landscaping, street tree and other tree planting to make best use of site characteristics and integrate into the surroundings, having regard to relevant green infrastructure strategies and delivery plans;</p>
Policy 2 Section 5	To provide a minor modification to the policy for factual clarification in response to Historic England's request in rep. 23960.	<p>Insert "including conservation area appraisals" after "historic character assessments" so that section 5 of the policy reads:</p> <p>5. Respect, protect and enhance local character and aesthetic quality (including landscape, townscape, and the historic environment), taking account of landscape or historic character assessments, including conservation area appraisals, design guides and codes, and maintain strategic gaps and landscape settings, including river valleys, undeveloped approaches and the character and setting of the Broads.</p>
Policy 3 Environmental Protection and Enhancement Paragraph 203	To align with the terminology used in the NPPF in response to Historic England's request in rep. 23963.	<p>Change the first sentence of the text in para. 203 to state "heritage assets" instead of "historic assets" so that it reads:</p> <p>As well as the historic heritage assets that are easily visible, there are also those that are hidden below ground.</p>

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Policy 3 Paragraph 204	To provide a minor modification to the text for factual clarification in response to Historic England's request in rep. 23966.	Change the text in the fourth sentence of para. 204 to state "scheduled monuments" so that it reads: Guidance for this can be obtained through a wide range of existing resources, such as landscape character assessments, conservation area appraisals, listed building and scheduled ancient monuments information and archaeological records; but it is usually necessary to undertake a heritage impact assessment in accordance with guidelines produced by Historic England and local validation requirements to understand the impact of a proposal on the significance of a heritage asset.
Policy 3 Paragraph 205	To align with the terminology used in the NPPF in response to Historic England's and the Broads Authority's requests in reps. 23963 and 23346.	Change the first sentence of the text in para. 205 to state "heritage assets" instead of "historic assets" so that it reads: The strategic approach to heritage is first to consider the potential location of development, for example does the location itself "fit" well in relation to adjoining settlements, and does it avoid intruding in important views of historic heritage assets?
Policy 3 Paragraph 207	To modify the text for a factual clarification in relation to national policy in response to Historic England's request in rep. 23967.	Change text to insert "The aim should be to avoid harm to the historic environment" at the beginning of para. 207 so that it reads: The aim should be to avoid harm to the historic environment. In certain cases, an element of harm to the historic environment resulting from development may be unavoidable: but this will only be justified if the benefits of the development outweigh the harm, and the harm is kept to a minimum, taking into account the relative importance of the heritage assets in accordance with national policy.
Policy 4 Strategic Infrastructure Paragraph 238	To provide an update to include new government greenhouse gas emission targets currently going through parliament which	Change the second sentence of para. 238 to:

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	the plan seeks to assist to implement.	This will be required to assist in meeting national targets to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and achieve zero carbon development by 2050.
Policy 5 Homes Paragraph 279	To correct the text on the need for Gypsy and Traveller pitches.	Revise the text to: The policy provides for the needs of Gypsies and Travellers. The planned expansion of the Swanton Road site in Norwich contributes to supply. A further 64 pitches for Gypsies and Travellers will be required by the end of the plan period in 2038. The criteria-based policy allows for additional delivery to meet need throughout the plan period and allows for the expansion of well-located existing sites. Since no sites have been submitted for consideration through the local plan, the intention is to bring additional sites forward through the Development Management process as well as having this criteria-based policy to allow further sites to come forward.
Paragraph 282	To update the Self-build Register figures.	Amend the text should to: Local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom-build housing. During the period October 2019 to October 2020, there were 108 households on the registers in Greater Norwich.
Paragraph 301	Amend paragraph 301 to be consistent with existing text in paragraph 389 and Appendix 7 on the application of the policy from adoption of the plan in response to representation 23947.	Amend paragraph 301 to read: Policy 7.5 provides for small scale windfall development of up to 3 to 5 dwellings per parish from adoption of the plan.
Paragraph 334	Amend the first clause of the paragraph to refer to the Broads	Amend text to:

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	rather than the Broads Authority Area in response to the Broads Authority's request.	To ensure growth is co-ordinated, overcomes local constraints and is well-designed in a sensitive location in and adjacent to the Broads Authority area,.....
Policy 7.1 Norwich urban area (including the fringe parishes)	Make corrections for clarity to the policy for East Norwich as highlighted in representation 23355.	<p>1. Amend the fourth line of the policy on East Norwich to include a full stop so that the paragraph reads:</p> <p>Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 9 including Carrow Works, the Deal Ground and the Utilities Site will create a highly sustainable mixed-use gateway quarter accommodating substantial housing growth and optimising economic benefits. Development across the sites will provide in the region of 4,000 additional homes in the plan period and significant new employment opportunities for around 6,000 jobs.</p> <p>2. Divide the second bullet point into two bullets so that the policy reads:</p> <p>This will include</p> <ul style="list-style-type: none"> • creating an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing needs; • the provision of area-wide economic and social infrastructure and services, including (but not limited to) the creation of new employment opportunities, a new local centre, and a new primary school should need be established;
Paragraph 391	To clarify the application of the policy in response to representation 23230	Amend the text to: "a. adjacent to settlements with development boundaries a development boundary; "
Appendix 2 Glossary	In response to Historic England representation 23976, amend	Add: Listed Building

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	<p>the glossary to include definitions for listed building, local listed building and registered park and garden. Also amend the glossary entry from scheduled ancient monument to scheduled monument.</p>	<p>A building on the National Heritage List for England which is protected due to its special architectural or historic interest. Listing helps to make sure that any future changes to the building do not result in the loss of its significance.</p> <p>Local Listed Building A building which, whilst not on the National Heritage List for England, is important in the local context due to its architectural or historic interest or its townscape value.</p> <p>Registered Park and Garden An outdoor area (which can include cemeteries or landscapes) listed on the Register of Parks and Gardens. Registration is a material consideration in planning terms, meaning local planning authorities must take into account the historic interest of the site when determining planning applications nearby.</p> <p>Amend: Scheduled Ancient Monument</p>						
Appendix 3 Monitoring Framework Indicator GNLP 16	To provide an update to include new government greenhouse gas emission targets currently going through parliament which the plan seeks to assist to implement.	Amend indicator GNLP 16 in the final column of the Climate Change section to To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national targets to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and 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.						
Appendix 3 Monitoring Framework New Indicator GNLP 43 (also	To include an indicator on upgrades on waste water infrastructure which is important both to serve growth and protect water quality.	<p>Include an indicator on upgrades on water infrastructure as follows:</p> <table border="1"> <thead> <tr> <th>Indicator Code</th> <th>Theme</th> <th>Indicator</th> </tr> </thead> <tbody> <tr> <td>GNLP 43</td> <td>Wastewater Recycling</td> <td>To have capacity available at waste-water</td> </tr> </tbody> </table>	Indicator Code	Theme	Indicator	GNLP 43	Wastewater Recycling	To have capacity available at waste-water
Indicator Code	Theme	Indicator						
GNLP 43	Wastewater Recycling	To have capacity available at waste-water						

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<p>amend the numbering of subsequent indicators to take account of this new inclusion)</p>				<p>recycling facilities for existing planning permissions plus 5 years predicted development.</p>
<p>Appendix 7</p>	<p>To correct an error noted by the GNLP team in the appendix which lists Reepham, Reepham Hackford and Reepham Whitwell as separate parishes under both columns. These are all part of Reepham parish, though they used to be separate ecclesiastical parishes.</p>	<p>In the first column ‘Three dwellings maximum’ under ‘Broadland parishes’ amend to: Morton on the Hill, Oulton, Reepham Whitwell, Ringland, Salle, Swannington, ...</p> <p>In the second column, ‘Five dwellings maximum’ under ‘Broadland parishes’ amend to: Reepham Hackford, Salhouse, South Walsham, Spixworth, Sprowston, Stratton Strawless, Strumpshaw, Taverham, Thorpe St Andrew, Upton with Fishley, Weston Longville, Woodbastwick and Wroxham.</p>		

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Appendix D

Schedule of Minor Modifications to the GNLP Sites Plan

This schedule sets out minor modifications to the Greater Norwich Local Plan (GNLP) Sites Plan following the Regulation 19 Publication Stage. It will be submitted with the GNLP on 30 July 2021.

The changes it includes are not considered to be needed to make the plan sound or legally compliant. Instead, they consist mainly of minor modifications to supporting text in the Sites Plan to provide clarification, updates and corrections of errors, mainly in response to representations made at the Regulation 19 stage of plan-making. The schedule also includes a limited number of minor changes to policies. However, none of these are considered to be substantive changes which would constitute main modifications.

Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Raised under Introduction paragraph 1.1 but will apply in various places throughout the document	To clarify the appropriate way to refer to the Broads Authority area throughout the plan in response to representation 23356 from the Broads Authority	Throughout the plan as relevant remove reference to 'National Park' and just say 'The Broads'.
Norwich Policy CC2	Factual Correction partly in response to Historic England's request in representation 23994 Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within	Additional policy Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	<p>the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	
<p>Norwich Paragraph 2.120 (supporting text to policy CC4a)</p>	<p>Factual Corrections partly in response to Historic England’s request in representation 23996</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an</p>	<p>Make factual correction/minor modification Add sentence to paragraph 2.120 to state: Development of the sites must address a number of constraints including its location within the City Centre Conservation Area and the Area of Main Archaeological Interest.</p> <p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	“area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Norwich Paragraph 2.121 (supporting text to policy CC4a)	Typographical/grammatical error as highlighted in representation 23370	Make a minor modification to correct the misspelling of ‘use’ in para. 2.121. Sites CC4a and 4b are likely to accommodate at least 250 homes with around 50 being accommodated on site CC4a and 200 on site CC4b. More may be accommodated, subject to an acceptable design and layout being achieved. Development of site CC4a should explore continued use /re-provision of the existing community garden facility. Development of site CC4b must be of a scale and form which respects and takes advantage of its riverside context and location in respect to the Broads National Park
Norwich Paragraph 2.120 (supporting text to policy CC4a)	Factual correction in response to additional information provided by Anglian Water in representation 23907	Make a minor modification to the supporting text to add text at the end of paragraph 2.120 to read: In addition, there is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance.
Norwich Paragraph 2.121 (supporting text to policy CC4a)	To provide clarification / consistency partly in response to representation 23369	Make a minor modification to add the following text in bold print after the final sentence of paragraph 2.121 so that it reads:

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
		Development of site CC4b must be of a scale and form which respects and takes advantage of its riverside context and location in respect to the Broads National Park. As the site lies adjacent to the River Wensum, it is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority.
Norwich Policy CC4b	<p>Factual correction partly in response to Historic England’s request in representation 23997</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as</p>	Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	a “minor modification” to the Plan.	
Norwich Policy CC7	<p>Factual correction partly in response to Historic England’s request in representation 23998</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
<p>Norwich Policy CC8</p>	<p>Factual correction partly in response to Historic England’s request in representation 23999</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application prior to development.</p>
<p>Norwich Policy CC10</p>	<p>Factual correction as highlighted in representation 24000</p>	<p>Make the following minor modifications: A typographical error has been highlighted. Deletion of the repeated criterion 2 is appropriate.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Norwich Policy CC11	<p>Factual correction partly in response to Historic England’s request in representation 24001</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>
Norwich Paragraph 2.203, (supporting text to policy CC16)	To provide clarification / consistency partly in response to	Make the following minor modification to paragraph 2.203 adding the following wording:

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	the request made by the Broads Authority in representation 23371	The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority.
Norwich Policy CC18 (CC19)	<p>Factual correction partly in response to Historic England’s request in representation 24005</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
<p>Norwich Policy CC24</p>	<p>Factual correction partly in response to Historic England’s request in representation 24006</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>
<p>Norwich Policy CC30</p>	<p>Factual correction partly in response to Historic England’s request in representation 24007</p>	<p>Make factual correction/minor modification. Additional Criterion in policy:</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.</p>	<p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>
<p>Norwich Policy GNLP0068</p>	<p>Correction of typographical error in response to representation 23364 from the Broads Authority</p>	<p>Make a minor modification adding a full stop before the final sentence of the bold allocation text.</p> <p>Land adjacent to the River Wensum and the Premier Inn, Duke Street (approx. 0.12ha) is allocated for residential-led mixed use development. This will include a minimum of 25 homes (or if developed for student</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
		accommodation, a minimum of 125 student bedrooms). (add full stop here) A small element of commercial, office, and/or educational use at ground floor level may also be acceptable.
Norwich Policy GNLP0068	<p>Factual correction partly in response to Historic England’s request in representation 23980</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Norwich Policy GNLPO133BR	Typographical error as highlighted by site promoter in representation 24076	Make a minor modification to correct the following error/factual change: 'Use Class F1' to be revised to read 'Use Class F.1 '.
Norwich Paragraph 2.35 (supporting text to policy GNLPO133C)	Additional detail / clarity provided by Anglian Water in representation 23896	Minor modification to make a change to the supporting text inserting “ There is an existing water mains in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance ” to paragraph 2.35
Norwich Policy GNLPO133DR	Correction of typographical / grammatical error as highlighted in representation 23982	<p>Make a Minor modification to correct the following error/factual change: 'addition of a comma after the word 'Terraces' and before the word 'Grade' in criterion 2 of the policy text</p> <p>Development should take account of its sensitive location adjoining the University Broad, protect the visual setting of the south elevations of “The Prospect” and respect the heritage significance and setting of the listed buildings within the campus, including the grade II* Sainsbury Centre and Norfolk and Suffolk Terraces, (add comma here) Grade II listed Lasdun Teaching Wall and Library and locally identified Crescent Wing of the Sainsbury Centre, Suffolk Walk, School of Music, Drama studio and Nelson Court; balanced against having regard to Lasdun’s original architectural vision which must be a material consideration in its design.</p>
Norwich Paragraph 2.37 (supporting text to policy GNLPO133DR)	Correction of typographical / grammatical error partly in response to Historic England’s request in representation 23982	<p>Make a minor modification to the supporting text to paragraph 2.37 to add “Assessment will also be required of any archaeology interest which may remain” following the second sentence.</p> <p>The policy seeks to enable expansion of the university, whilst conserving the landscape and architectural significance of the UEA and promoting public access to open spaces. Therefore it is essential that development of the site minimises impact on the river valley and enhances the setting of the listed</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
		buildings at the university. Assessment will also be required of any archaeology interest which may remain. Consideration of the original Lasdun plan for a 'Village on the hill' will be important, as will design taking full account of other buildings of visual importance to the southern view of 'The Prospect', including the School of Music and Suffolk Walk. Intrusion into the valley should be limited to protect the valley's appearance and use.
Norwich Paragraph 2.51 (supporting text to policy GNLP0401)	Correction of typographical / grammatical error in response to representation 23367	Minor modification: delete brackets around "at least 250 bedrooms" at paragraph 2.51 The site is likely to accommodate at least 100 homes, or if the site is developed to include student accommodation at least 250 bedrooms. More housing may be accommodated, subject to an acceptable design and layout being achieved.
Norwich Supporting text to policy GNLP0401	Additional detail / clarity provided by Anglian Water in representation 23901	Make a minor modification to the supporting text inserting an additional paragraph stating: "There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance"
Norwich Policy 0409AR	Factual correction partly in response to Environment Agency's representation 23788 Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3	Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	<p>Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	
<p>Norwich Supporting text to policy GNLPO409AR</p>	<p>Additional detail / clarity partly as provided by Anglian Water in representation 23904</p>	<p>Make a minor modification to the supporting text inserting an additional paragraph stating: “There is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”</p>
<p>Norwich Policy GNLPO409AR</p>	<p>Factual correction partly in response to Historic England’s request in representation 23985</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	<p>Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	
<p>Norwich Supporting text to policy GNLP0409BR</p>	<p>Additional detail / clarity as provided by Anglian Water in representation 23903</p>	<p>Make a minor modification to the supporting text inserting an additional paragraph stating: “There is an existing surface water sewer in Anglian Water’s ownership within the boundary of site GNLP0409BR. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”</p>
<p>Norwich Paragraph 2.57 (supporting text to policy GNLP0409BR)</p>	<p>Additional detail / clarity partly in response to Historic England’s request in representation 23986.</p>	<p>Make a minor modification to the supporting text to paragraph 2.57 to add “Assessment will also be required of any archaeology interest which may remain to site GNLP0409BR” following the second sentence.</p> <p>2.57 The western section of the site is within the City Centre Conservation Area and the site also contains standing remains of the city wall (Scheduled Monument), two Grade II listed cottages (77-79 Barrack Street) and two</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
		locally listed cottages. The site is situated within the area of main archaeological interest and it has been identified that the site has significant underground archaeological remains. Assessment will also be required of any archaeology interest which may remain to site GNLP0409BR. It is important that the development protects and enhances the setting of the wall.
Norwich Policy GNLP0451	<p>Factual correction partly in response to Historic England’s request in representation 23987</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	a “minor modification” to the Plan.	
Norwich Supporting text to policy GNLP0506	Additional detail / clarity provided by Anglian Water in representation 23905	Make a minor modification to the supporting text inserting an additional paragraph stating: “There are existing mains and foul and surface water sewers in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”
Norwich Policy GNLP0506	<p>Factual correction partly in response to Historic England’s request in representation 23988</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Norwich Policy GNLP2114	<p>Factual correction partly in response to Historic England’s request in representation 23990</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as</p>	<p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	a “minor modification” to the Plan.	
Norwich Policy GNLP3054	<p>Factual correction partly in response to representation 23993</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	<p>Minor modification as a factual correction to the second sentence of criteria 2, delete reference to listed buildings on site as there are none within the defined red line boundary:</p> <p>Proposals will include the protection of the locally listed buildings on the site and the enhancement of the significance of the setting of designated heritage assets both on and off site</p> <p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application</p>

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Norwich Policy 0360/3053/R10	Typographical / spelling correction partly in response to representation 23363	<p>Minor modification: Correction of typographical error to correct spelling of “affected” at criterion 6</p> <p>There will be the general presumption in favour of the repair and re-use of heritage assets on site as part of any site regeneration, however any application for redevelopment will be considered on its merit. Great weight will be given to the conservation of all designated heritage assets and proposals should provide a suitable setting for designated heritage assets affected by the proposal on an off site including key views from and into the site. Development proposals should draw upon local character and distinctiveness and preserve or enhance the character and appearance of the conservation areas affected, Scheduled monuments, listed building, locally listed buildings and other non designated heritage assets on and adjacent to the site (including any contribution made to their significance by setting). Development proposals should also consider heritage assets below ground and the impact upon the Broads.</p>
Taverham Policy and Map GNLP0337	Factual correction to exclude Marriott’s Way from allocation area in response to representation 24080 from the site promoter	Amend Policy GNLP0337R to read: ‘Land between Fir Covert Road and Reephams Road, Taverham (78.36ha) is allocated for residential development. The site area on the map accompanying the policy will also need to be amended.
Thorpe St Andrew Introductory paragraph 3.75	Factual update to paragraph 3.75 in response to representation 23373 from the Broads Authority to reflect that both the Church of St Andrews and its ruins are listed.	Amend the final sentence of paragraph 3.75 as follows” ‘including the Grade II* Thorpe Hall and the Church of St Andrew and its ruins ’

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Colney Policy GNLP0253	Site allocation policy refers to use class D1. This use class has been discontinued and therefore this is a factual error which should be corrected. Picked up by GNLP officers.	Amend introductory wording of Policy GNLP0253 to read: 'Uses will include dementia care, extra care housing, university research space E(g)(ii), and healthcare facilities E(e) '.
Drayton Policy DRA1	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: 'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration' .
Aylsham Paragraph 4.2	To correct and clarify the market days in Aylsham. To provide an update partly in response to representations about Aylsham.	Change the first sentence of para 4.2 to: "At the heart of the town is the Market Place that is well-known for its weekly Monday and Friday markets, and regular monthly Farmers' markets."
Aylsham Paragraph 4.6 (supporting text to policy GNLP0311, 0595 and 2060)	To add to the supporting text at the end of paragraph 4.6.	At the end of paragraph 4.6 add: ' There are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site. These should be taken onto account in the design of development including safeguarding suitable access for maintenance.'

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	To provide an update in response to representation 23840 from Anglian Water.	
Aylsham Paragraph 4.8 (supporting text to policy GNLP0596R)	To add to the supporting text at the end of paragraph 4.8. To provide an update in response to representations 23844 from Anglian Water.	At the end of paragraph 4.8 add: ' There are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site. These should be taken onto account in the design of development including safeguarding suitable access for maintenance. '
Aylsham Policy GNLP0596R	To remove the reference to Copeman Road which has been included in error. To provide an update in response to representations 24142, 24143 and 24144.	Revised wording of Policy GNLP0596R bullet point 4 to say: ' Pedestrian and cycle access only from Buxton Road. Safeguarding of existing Public Right of Way at south of site. '
Aylsham Policy GNLP0596R	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: ' Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration '.

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Aylsham Policy AYL3	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: 'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration'.
Aylsham Policy AYL4	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: 'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration'.
Harleston Paragraph 4.33 (supporting text to policy GNLP2108)	To add additional wording to the supporting text at the end of paragraph 4.33 for clarity.	At the end of paragraph 4.33 add: 'There is an existing water mains and surface water sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance.'

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	To provide an update in response to representation 23847 from Anglian Water.	
Harleston Paragraph 4.35 (supporting text to policy GNLP2136)	To add additional wording to the supporting text at the end of paragraph 4.35 for clarity. To provide an update in response to representation 23848 from Anglian Water.	At the end of paragraph 4.35 add: ‘There is an existing water mains and surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance.’
Harleston Paragraph 4.36 (supporting text to policy HAR4)	To add additional wording to the supporting text at the end of paragraph 4.36 for clarity. To provide an update in response to representation 23849 from Anglian Water.	At the end of paragraph 4.36 add: ‘There is an existing water mains and surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance.’
Harleston Paragraph 4.37 (supporting text to policy HAR5)	To add additional wording to the supporting text at the end of paragraph 4.37 for clarity. To provide an update in response to representation 23850 from Anglian Water.	At the end of paragraph 4.37 add: ‘There is an existing water mains and surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance.’
Harleston Paragraph 4.38 (supporting text to policy HAR6)	To add additional wording to the supporting text at the end of paragraph 4.38 for clarity.	At the end of paragraph 4.38 add: ‘There is an existing water mains and surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance.’

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	To provide an update in response to representation 23851 from Anglian Water.	
Wymondham Policy GNLP0354R	To remove the reference to Abbey Road which has been included in error and clarify that Preston venue is pedestrian/cycle access only. To provide an update in response to representation 23609.	Revised wording of Policy GNLP0354R bullet point 5 to say: ‘The trees and hedgerows bordering the site will be protected, enhanced and incorporated into the scheme, acknowledging that pedestrian/cycle access at Preston Avenue will be required.’
Acle Paragraph 5.5 (supporting text to policy GNLP0378 R /2139R)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23852	Before the penultimate sentence in paragraph 5.5, insert: “There is an existing water main in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”
Acle Policy GNLP0378R/ 2139R	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: ‘Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration’.

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Acle Paragraph 5.6 (supporting text to policy ACL1)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23853	Before the final sentence in paragraph 5.6, insert: “ There is an existing water main in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance ”
Brundall Paragraph 5.24 (supporting text to policy BRU3)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23854	At the end of paragraph 5.24, insert: “ There is an existing foul sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the open space development including safeguarding suitable access for maintenance ”
Hethersett Paragraph 5.33 (supporting text to policy HET3)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23856	At the end of paragraph 5.33, insert: “ There is an existing water main in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the open space development including safeguarding suitable access for maintenance. ”
Hethersett Policy HET1 (part of GNLP0177A)	The wording ‘Strategic Allocation’ should have been included in the policy as with other similar sized sites. The wording was missed in error in this instance. Picked up by GNLP Team so no representation ID.	Add the words ‘ Strategic Allocation ’ after the policy title GNLP HET1 (part of GNLP0177A)
Hingham Paragraph 5.40 (supporting text to policy HIN2)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23857	At the end of paragraph 5.40, insert: “ There is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance ”

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Loddon Policy GNLP0312	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: 'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration' .
Loddon Paragraph 5.47 (supporting text to policy LOD3)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23858	At the end of paragraph 5.47, insert: "There is an existing surface water and foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance."
Chedgrave Policy GNLP0463R	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: 'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration' .

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Blofield Heath Paragraph 6.8 (supporting text to policy BLO5)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23860	At the end of paragraph 6.8 insert: There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of development including safeguarding suitable access for maintenance.
Buxton with Lamas Paragraph 6.14 (supporting text to policy GNDP0297)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23861	At the end of paragraph 6.14 insert: There is an existing rising main (pressurised sewer) in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding access for maintenance.
Cantley Settlement Map	To add the Broads Authority area onto the settlement map which has been missed in error, in response to Broads Authority representation 23376	Add Broads Authority area to the Cantley Settlement Map
Cawston Policy CAW2	Minerals and Waste have noticed a few occasions where sites that they have responded on previously regarding a requirement for mineral or waste safeguarding in the allocation policy have been missed and a modification would be required. This is considered to be a factual error that could be corrected through a minor modification to the plan. No representation ID	Add an additional policy requirement to read: 'Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as this site is partly underlain by safeguarded minerals resources. The benefits of extracting the minerals, if feasible, will be taken into consideration'.
Coltishall Settlement Map	To add the Broads Authority area onto the settlement map which has been missed in error, in	Add Broads Authority area to the Coltishall Settlement Map

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
	response to Broads Authority representation 23377	
Foulsham Paragraph 6.37 (supporting text to policy FOU2)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23863	At the end of paragraph 6.37 insert: There is an existing rising main (pressurised sewer) in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding access for maintenance.
Horsford Paragraph 6.68 (supporting text to policy 0264)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23872	At the end of paragraph 6.68 insert: There are existing foul and surface water sewers in Anglian Water's ownership within the boundary of the site. These should be taken into account in the design of the development including safeguarding suitable access for maintenance.
Horsham St Faith Policy 0125R	To remove policy requirement 3 regarding the need for two points of vehicular access which was added in error, in response to representation 24096 from Bidwells	Delete Policy Requirement 3 and renumber accordingly: 3. Provision of two vehicular accesses
Horsham St Faith Paragraph 6.74 (supporting text to policy HNF1)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23874	At the end of paragraph 6.74 insert: There is an existing foul sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance.
Horsham St Faith Settlement Map	To add Site GNLP1061R onto the settlement map which has been missed in error, picked up by GNLP team so no representation ID	Add Site GNLP1061R onto the Horsham St Faith Settlement Map

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Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Salhouse Paragraph 6.100 (supporting text to policy 0188)	To provide clarity regarding underlying water infrastructure, in response to Anglian Water representation 23875	At the end of paragraph 6.100 insert: There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken in account in the design of the development including safeguarding suitable access for maintenance.

Appendix E

Schedule of not duly made, general and late representations

Date Submitted	Email No	Name	Organisation	Email or Post	Attachments?	Full Representation
Late Representations						
	<u>1</u>	Godfrey Sayers	N/A	Email	No	<p>Regulation 19 – response to Greater Norwich Local Plan consultation Comments on the failure to adequately address sustainability principles in the GNLP</p> <p>The joint councils involved in the Greater Norwich Area are currently consulting on the revised local plan. This envisages significant growth in the population of around 16% between 2018 and 2038. The basis of the development plan has to be supported by 'sustainability principles'. This is one of the key underlying fundamentals which are supposed to guide development policy, yet at the same time, the County Council and other partners such as Anglian Water etc. are only too aware that there are massive water shortage problems in Norfolk, and East Anglia in general and have established a project the Sustainable Water Management Plan for Norfolk. From this evidence and other sources it is apparent that both our surface and ground water resources are being depleted by abstraction and drought issues faster than they can be recharged, and are projected to worsen, and that this is causing us to experience 'poor' quality ground water / surface water due to pollution and increasing concentrations of this due to diminishing volumes.</p> <p>Clearly, if water is being used faster than it is being replenished then we are going to run short – in fact we already are, seriously so. Technology is not the answer as there are clearly no mechanisms in place to help to reduce demand sufficiently to compensate, and this is not a new problem as this issue has been discussed and known about since the 1990s and nothing has been done which would actually have any meaningful impact on the issues - who would pay and how basically.</p> <p>There is no indication in the GNLP as to how this situation will be addressed in a measured, quantified, monitored and responsible manner which would indicate that this situation will not worsen, that damage to our health and environment (particularly by the drying out of key wetland habitats due to abstraction and the damage to Protected habitats and species) will not occur as a direct result of the amounts of growth provided for in the GNLP. As such the GNLP does not meet sustainability criteria and would be in contradiction of the Habitats Regulations.</p> <p>Paragraph 162 of the Sustainable Growth Strategy seeks to promote Norwich as a key growth area to support the development of the national economy. It goes on to say that this will be compatible with 'protecting and enhancing the environment'. In preceding paragraphs it states that both greenfield and brownfield sites will be developed. The aims of the policy are fundamentally in conflict and cannot be reconciled. It is not possible to achieve large scale growth and protect and enhance the environment. The site allocations chosen and the development strategy proposed clearly will urbanise and pollute (air, water, light and noise) what are currently rural areas. It also removes the appeal and attractiveness of rural areas and replaces it with unattractive, unappealing urban sprawl. This is not consistent with protection of the environment and it is not correct to state that it is. The plan therefore fails to demonstrate that it is sustainable in this respect.</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>Similarly the choice of an area of the Country with limited infrastructure and positioned poorly geographically, making transport costs and mileage greater than for other areas is again contrary to good sustainability principles. Other areas of the Country are much better connected, have better existing infrastructure and clearly will have significantly lower adverse environmental impacts from development than those proposed in the GNLP. No sequential test to compare or even consider these issues is contained in the Plan, and therefore it fails the test of sustainability on this account.</p> <p>The sustainability references need to be considered further. Large scale development as proposed will require responses in the form of new hospitals, schools, medical facilities and personnel, social services, older person's services etc. These needs are referenced but not quantified and planned for within the GNLP and there are no indications where or specifically how they will be provided for although broad references to various sources of funding (none specific) are referred to. To propose large scale migration and development without ensuring that the means to support it are present and will be adequate / appropriately located is again risking an unsustainable community development and contrary to sustainability principles.</p> <p>Specific comments on site proposals</p> <p>Site allocation GNLP 0466R / HNF2. The policy in the Broadland District LP states that only those employment uses which have 'significant specific benefit from a use being located near the airport' shall be permitted.</p> <p>Clearly this is intended as a sustainability reason for the location of and otherwise intrusive and inappropriately located industrial estate which extends the developed area of Norwich approx. 1m further north than currently exists into open and undeveloped greenfield countryside.</p>

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						However it is noted that this condition is not continued in the GNLP policy for this site and this is clearly an omission which is contrary to sustainability principles as the location of such a development to the north eastern side of Norwich – adding transport miles to any communication to this location from more or less anywhere else in the County or Country is contrary to such principles.
04/05/2021	33	Eleanor Laming	N/A	Email	No	<p>I realise that it is too late to make comments on the GNLP as the Reg 19 consultation ended on 22 March 2021 but thought I would get in touch just in case my comments might be considered.</p> <p>I live in Broadland and noted that on 20 April 2021 an updated version of the Norfolk Strategic Planning Framework (NSPF) was presented to BDC Cabinet for approval (too late for the GNLP consultation process)</p> <p>The new NSPF has come up with some sound guidance for how to address Climate Change in local development plans in Norfolk. It includes a new Section 8 and Agreement 19 which are supported by at least 18 papers produced by the project team.</p> <p>However, as stated in Agreement 19, the GNLP councils who are signatories to the document, have agreed to delay implementing the proposals, until the next review of the GNLP, which is at least 5 years away. Experts responding to the recent GNLP consultation have raised concerns about the lack of policies on low carbon construction, low energy homes, renewable energy, and the quantum and spatial distribution of the housing proposed. (Experts referred to include: CPRE, ClientEarth, Climate Emergency Planning and Policy (CEPP) and the Centre for Sustainable Energy (CSE) - all of whom made submissions to the recent consultation)</p> <p>If the NSPF was implemented now, and its guidance was incorporated into the GNLP before its public examination this autumn, millions of tonnes of CO2 emissions could be saved over the period of the plan. Could the draft GNLP be reviewed against the new NSPF strategic guidance to address climate change?</p>
21/05/2021	34	Sam Henry	Colney Parish Council	Email	Yes	<p>I am just emailing on behalf of Colney Parish Meeting regarding the Greater Norwich Local Plan Regulation 19.</p> <p>Although the consultation period has closed, I note that late submissions can be submitted to the independent planning inspector. I cannot see an option on the website to do this, however Colney would like to submit the attached comments to the independent planning inspector. The comments relate specifically to the continuing issue of flooding, as well as the Dannatt Strategic Flood Review.</p> <p>The Parish has asked me to forward the response onto you as they strongly feel that this is an important issue which requires wider attention and further action.</p>
12/07/2021	35	Nick Hodgson	N/A	Email	Yes	<p>Please find attached comments and supporting documents reference the above.</p> <p>I understand that this representation is outside the statutory period but that you will still provide it to the inspector.</p> <p>In my view, there has been disappointing consultation with the local community at Caistor St Edmund regarding such a significant proposed allocation and as such I would very much urge you to consider carefully the comments contained herein. Particularly in relation to inadequacy of the local highway network and also what seems to be very premature plans which are currently in circulation from the land promoters.</p> <p>Additionally, I have no doubt that the promoter/developer is anticipating significantly greater numbers of units than the draft allocation of 180 (which in itself is far too much).</p> <p>They reference in their comments that the site is immediately available and deliverable but they have not addressed any of the major issues surrounding both highways and viability.</p> <p>I would appreciate it if you could confirm receipt and also that these representations will be presented to the Inspector and taken into consideration in your submissions.</p>
Not Duly Made Reps						
22/03/2021	2	Anna Saunders	N/A	Email	No	<p>I would like to raise objection to the proposed development within Horsham St Faith. Which I believe would be overdevelopment of our village. I have lived in this village for 18 years, it is a rural location which is already seeing new build developments take up its green space as the current development Crown Meadows is not even complete. Therefore we cannot judge yet the strain this existing development will put on our local facilities.</p> <p>This village has always been a rural community and such its facilities are reflective of that of a small village. We have a small school, doctors surgery and only one very small shop. None of these facilities will be able to deal with the continual influx of new build properties.</p> <p>I know from personal experience that the local school cannot accommodate extra families from the additional developments, it just isn't big enough and doesn't have enough facilities, it is a basic village primary school.</p> <p>In addition the Doctors surgery has already merged with Drayton and now Horsford, this is because again it is a small surgery and cannot accommodate the extra resources needed for additional patients.</p>

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						<p>The junction at the Horsham St Faith end of the village near this proposed development is often blocked due to all the workers coming out of the commercial park, it is not designed to accommodate large amounts of traffic, it is just a village road and therefore I do not believe an additional 50 homes will make this any easier, most homes have at least 2 cars, sometimes more. At busy rush hour times this is just not manageable to join the A140 to get out of the village. There is already significant outside traffic which visits the village due to the Crematorium which is based here.</p> <p>Neighbouring village Horsford has already and still is experience huge amounts of development with regards to new homes and this affects the prices of the existing homes, which would be the same result for the existing homeowners in Horsham St Faith.</p> <p>On a final point, it really should be noted that Horsham St Faith is a very historical and picturesque village, with the Church, Priory and history surrounding the village, including links to the Twinings family and Henry VIII with beautiful properties which make the village, something special, not your average housing estate. I believe this historical village and green space should be left undisturbed without additional development for the unique and historical place it is, it is a little jewel in our Norfolk crown.</p> <p>I would be very grateful if you could consider these points which will spoil our beautiful village if over developed.</p>
31/01/2021	<u>3</u>	Michael Copsey	N/A	Email	No	<p>As the nearest inhabitant of the proposed Park and Ride I would like to make some comments on the relevance to us of this site.</p> <p>1 Excess noise. 2 Lights on 24 hrs a day. 3 De value our property. 4 Unless the site entrance / exit is further east of our property the increase of traffic flow will be much heavier than at present. 5 With the camber of the field sloping towards the Bungay Road it will increase the flooding that happens already on the Bungay Road near the farm entrance.</p>
01/02/2021	<u>4</u>	Willem Buttinger	N/A	Email	No	<p>My major and most serious comment on the plan is that it largely ignores the scientific evidence that we need to move to a 'sustainable future'. A sustainable future is not compatible with economic growth. We need to consume less, have less road and air transport and work to stabilising population. Thinking global and acting local is not in evidence very much in the report.</p> <p>It is the responsibility of the authority to protect our futures the plan does not do this and should be re written. It is based on outdated thinking with business as usual with a just enough concern for the environment to hopefully placate readers.</p>
01/02/2021	<u>5</u>	Wendy Putnam	N/A	Email	No	<p>I object to 50 homes being built off west lane in Horsham st faith. There is too much traffic in the village at the moment. It is difficult to get an appointment at the medical practice. We want to live in a green environment not a housing estate.</p>
01/02/2021	<u>6</u>	Rachel Scarff	N/A	Email	No	<p>I wish to formally object to the above site allocation on the basis that it is the thin edge of the wedge, and the development is not suitable. It is not well accessed to the school as mentioned in the above application. With evidence to confirm that this distance would not be walked, and therefore would increase school traffic of cars. The school is also over subscribed.</p> <p>The doctors is already over subscribed.</p> <p>There is not the infrastructure to support more development this side of the village, with 60 new homes already being built the other end.</p> <p>With it being so close to a 60 limit, the industrial site, and the existing commercial site, it would not be a desirable location for residents.</p> <p>The light and operations of the commercial park currently do not impact residents, however should homes be built, this would no doubt change.</p> <p>The existing foul sewerage systems would not work well with new developments.</p>

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23/02/2021	<u>7</u>	Julie Gilbert	N/A	Email	No	<p>I am writing to express my concern at the way the GNLP Board and the District Councils have passed the plans for 550 new homes to be built in Aylsham, without full consultation. You state that a full consultation was held in 2019/20, even though, in Aylsham's case, it was for 300 new homes not 550.</p> <p>The publication of the draft plan in the Regulation 18 consultation stated:</p> <p>'There is one site identified as a preferred option in Aylsham providing for 300 new homes. There are no carried forward allocations but a total of 225 additional dwellings with planning permission. This gives a total deliverable housing commitment for Aylsham of 525 homes between 2018-2038.'</p> <p>The above figures are approximately 2 years behind the publication date of July 2019 so the 225 additional dwellings mentioned were the last phases of the Bure Meadows and Willow Park estates which were being built at the time. Therefore, it is plain to see that the recommendation was for one site only to be put forward.</p> <p>Hence, due to the lack of full consultation regarding the second site, the plan surely has not been prepared in accordance with all legal and procedural requirements and does not meet the prescribed tests of soundness.</p> <p>Whilst I fully appreciate that new homes have to be built, the consultation was only for 300. Aylsham, as a 'Market Town', cannot continue to support the amount of housing that is being thrust upon it. There have been 3 large estates built over the last 10 years and yet planning committees and district councils seem loath to invest in more schools, doctors surgeries, car parks and basic infrastructure - possibly because there is no monetary gain?</p> <p>I therefore strongly object to any more than 300 new homes being built and would like to see the plan amended accordingly before it goes to the next stage.</p>
25/02/2021	<u>8</u>	Mary Reeve	N/A	Email	No	<p>I am writing in support of the CPRE in its desire to preserve a green belt and green wedges around Norwich. I feel this is essential to preserve the character and scale of our beautiful and unique City.</p> <p>It is of course important to prevent any further urban sprawl not only for the sake of the City but to protect the character and status of the surrounding villages. I believe it is already planned to keep the villages and towns separate from each other eg. Hethersett and Cringleford, Hethersett and Wymondham. I do hope this is the case.</p>
27/02/2021	<u>9</u>	Michael Goodwin	N/A	Email	No	<p>I write to register my concern about the proposed extra housing provision for Aylsham. I am alarmed that there has been no formal consultation about the proposed additional 250 houses, and that as a result considerations about infrastructure have not been taken into account. Can we have some clarity about time scales and what community provisions will be included?</p> <p>I would be very keen to ask you to ensure that any new building adheres to the strictest green credentials. I am disappointed that no mention is made of the possible environmental impact. We urgently need houses that have zero carbon emissions, low energy using up to date ground heat and grey water recycling systems. This would make a strong statement about the area's aspirations.</p> <p>New houses need to be linked to Aylsham town centre by safe bike lanes so that car use is discouraged. Houses should have external charging points for electric vehicles. Such criteria should be a basic requirement of any new building. If we are going to build, let's at least be at the forefront of sustainable development.</p>
08/02/2021	<u>10</u>	Mary O'Brian	N/A	Email	No	<p>We write to raise our concerns regarding the building of more homes in Hingham village. The Norwich Road site (adjacent to The Hops) for 80 homes and the site on Dereham Road for 20 homes.</p> <p>We have lived in Hingham for 22 years and have witnessed the inclusion of many new homes, including The Hops, and the social housing along Norwich Street. How much more housing can this village accommodate!</p> <p>It is becoming more and more difficult to get a doctor's appointment ever since the new housing estate of The Hops and the social housing was built. Speaking to various people in the village, the school, as it stands, is not equipped for any extra children. The infrastructure just does not accommodate these services and adding further housing will have an absolutely detrimental effect on the village.</p> <p>We object quite strongly to any further housing.</p>

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Date Submitted	Email No	Name	Organisation	Email or Post	Attachments?	Full Representation
01/03/2021	11	Stephen Cooper	N/A	Email	No	<p>According to the Greater Norwich Local Development Plan you have submitted, I agree with your decision to develop the sites you have nominated;</p> <p>GNLP 0520 Norwich Road, GNLP 0503 Dereham Road.</p> <p>I have to say that I totally disagree with the Hingham Parish Council and Clayland Homes application to develop sites;</p> <p>GNLP 0298 Watton Road, GNLP 0335 Watton Road.</p> <p>I understand the need for development and houses for people in Hingham but the Watton Road proposals would lead to a massive increase in vehicles travelling through the town. I can not believe how the Parish council can not see this? If the development were to go ahead at a proposed 250 houses, this would lead to an increase of at least 500 cars in the town. Given that the school, doctors surgery and Co-Op is at the other end of the town, are the town council so naive to think that all the new residents will walk to said locations? Not only that , the amount of construction traffic require to build the site would be immense, with most of it travelling through the town.</p> <p>Are the council going to build two roundabouts in the village to allow the traffic to flow freely? Entering and exiting the development onto an already busy road would be problematic and given that the most accidents that happen in the town occur at the Attleborough/Dereham road junction, another roundabout would also have to be constructed, which would destroy a large part of the beautiful Fairland.</p> <p>Whilst Clayland houses state that they would construct a “woodland area”, could I please ask why this is only for the benefit of the new residents and not the existing town residents. Surely, they can develop the “woodland area” in-between the houses on the Watton Road and the new development? This would ensure that all residents could have easy access to it.</p> <p>Logistically, the Norwich Road plan makes much more sense, in that it spares the town and residents the aggravation of the construction of the new houses as the majority of traffic will be confined to one end of the town.</p> <p>The Parish council argue that there would be an increased risk of flooding due to the Norwich Road site, but surely any responsible builder would have plans to deal and negate this issue. As for the issue of the perceived view approaching the town, I hardly think this is an issue when proposing to build 250 properties anywhere!!! If the Parish council are claiming that this is such an issue, then surely the builder can be made to plant trees to help hide the development from the road???</p> <p>I agree with the statement that supports GNLDP in regard of the development “swamping” the already stretched infrastructure within the town. Residents already know that the school is full and the excellent GP surgery would struggle to cope with potentially an addition 1000 people, that a site of that size would bring. The Co-op would be ideally situated to serve that additional increase of residents.</p> <p>In summary, I would like to lodge my objection to the development of the Watton Road site on the grounds that it is logistically too big and at the wrong end of the town to enable its residents to access the towns vital infrastructure. The increased traffic that would have to travel through the town, would be detrimental to such a small town and any pretence to reducing emissions and our carbon footprint.</p>

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03/03/2021	12	David Will	N/A	Email	Yes	<p>Mrs Robinson submitted a Greater Norwich Site Submission Form to the Team on 9th March 2020 which has been acknowledged by the Team and wishes to make further representations following the proposal to carry forward two potential sites in Coltishall and none in Horstead.</p> <p>Corrections to the Submitted Form GNLP4020</p> <ol style="list-style-type: none"> 1. 3b Mrs Robinson-Holt is the sole owner of this site, re-registration with HM Land Registry is in progress of being completed 2. 4a The land is currently used for grazing but is classified as agricultural. 3. 5a Because of the shape of the site eighteen dwellings is thought to be a realistic target of which six would be affordable housing. The site is located next to affordable housing in the ownership of a housing association. 4. 8 Mains water is connected to the site and mains drainage, electricity and gas are available but not connected. <p>The Representation</p> <p>This is a relatively level site with a long frontage to the Buxton Road that easily achieves the highway authority's required standards, The entire frontage is within a 30 mile per hour zone. The site has an easily drained shingle sub base ideal for foundation construction, there are no contamination issues. This is a viable housing construction site.</p> <p>The site is located next to social housing providing affordable housing for local residents, it is within easy walking distance of Horstead village school access on wide local authority maintained footpaths. The adjoining social housing estate was chosen because of its location and accessibility and the local amenities in Horstead, particularly the school, need further user to become viable.</p> <p>The proposed allocations in Coltishall are the wrong side on the bridge over the river Bure, the bridge is narrow and takes heavy goods traffic making its way to North Walsham which is a major industrial centre in North Norfolk. Coltishall itself is a major highways hazard, having negotiated the bridge turning either right or left is a nightmare, narrow roads and parked vehicles make movement very difficult for all types of vehicles and there is no bypass scheduled or available for Coltishall. Many heavy vehicles nor divert through Wroxham and Smallburgh to access North Walsham although Wroxham bridge is another major and the shopping centre makes things very difficult for drivers. Indeed many drivers regard Coltisham as a Wroxham by pass by turning right after Coltishall bridge and proceeding through narrow roads and parked vehicles to Wroxham.</p> <p>Any expansion of housing development in Coltishall will cause major problems for both residents and road users.</p> <p>The two sites promote for allocation in Coltishall have further problems, one is very close to a dangerous bend and has contaminated land issues which are likely to make the site unviable and certainly unviable for affordable housing.</p> <p>The site proposed for development has highways issues in terms of both access and visibility and viability difficulty.</p> <p>The local planning authorities should not be considering sites in Coltisham for adoption because of the highways difficulties and to viability and should consider the Buxton Road alternative.</p>
03/03/2021	13	Philip Jordan	N/A	Email	No	<p>With reference to your recent letter. I would like to make the following comments on the above plan:-</p> <ol style="list-style-type: none"> 1, No new substantial residential developments should take place in the Taverham - Drayton area of greater Norwich, particularly in view of:- <ol style="list-style-type: none"> a) The gross inadequacy of the existing transport infrastructure to cope with any more road traffic, especially the daily tidal north/south (a.m.) and south/north (p.m.) flows that cause gross congestion and pollution along the many 'rat runs' in the area. However, completion of the Broadland Northway Western Link (if it is ever built) would certainly change the dynamics of the current traffic flows and may be a way of responsibly continuing to provide new housing in the area of Taverham/Drayton when it is actually necessary and not merely a mechanism for increasing Council Tax revenue. b) Any new residential development on the scale envisaged within the GNLP, especially the proposed mammoth expansion of the Thorpe Marriott - Fir Covert Road undertaking, would be an environmental disaster as well as placing an unbearable load on the already over subscribed medical and educational facilities. The mere provision of new buildings would not solve these problems as there have been great difficulties attracting suitable applicants to fill the already existing vacancies particularly in the GP practise at Taverham. c) I am sure that you must be aware that the housing minister Robert Jenrich announced that the controversial planning formula responsible for the Greater Norwich Local Plan has been amended to ensure that more residential development takes place in urban areas of the North of England where homes are most needed rather than in the rural areas of the South of the country.

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05/03/2021	14	Sheila Merriman	N/A	Email	Yes	<p>I have concerns regarding the proposed development GNLP0596R.</p> <p>1. Surface water drainage (a) The drainage lagoon shown on drawing no. 2019-364-007 is adjacent to the A140 Cromer Road. This part of the A140 is built up on an embankment. Seepage and/or overflow from the lagoon will erode the embankment. (b) The site also slopes down to Buxton Road in the area marked as 'Footpath/cycle/emergency access only'. There is no existing facility for surface water drainage on any part of Buxton Road adjacent to the proposed development. New housing will cause surface water run off onto Buxton Road and hence onto Bure Valley Lane. Bure Valley Lane is under water for most of the winter: additional water from the proposed development will make it impassable.</p> <p>2. Access to Buxton Road (a) Your road safety audit will have identified the dangers in permitting additional vehicles to use Buxton Road. The dangers include a blind bend near the junction with Norwich Road, also a lack of pavements for most of Buxton Road. It is therefore inappropriate that there should be an 'emergency access' as shown on drawing no. 2019-364-007. (b) The 'footpath/cycle' access onto Buxton Road will significantly increase pedestrian and cycle traffic along Buxton Road. Most of Buxton Road does not have pavements but has traffic from the 250 houses already using Buxton Road. The principal route for pedestrians and cyclists travelling to Aylsham High School and to the proposed primary school on the development site south of Burgh Road will be along Bure Valley Lane. Bure Valley Lane is a seasonally water-logged, single track, road approached by a blind bend from Buxton Road. It is inappropriate to promote a potentially high volume of pedestrian and cycle traffic in this area.</p> <p>3. Infrastructure Any new development will strain the existing infrastructure of the town. To have two concurrent developments (i.e. the one south of Burgh Road and this one) will cause an intolerable strain. I suggest that completing the Burgh Road development then reassessing the need for housing and development of accompanying infrastructure would be prudent.</p>
06/03/2021	15	Janet Prior	N/A	Email	No	<p>I wish to place a strong objection to the plan to build another 550 houses in Aylsham. I believe that this has been passed with the general consent of the local residents.</p> <p>Having lived locally to Aylsham all my life – the continued development of this area is ruining the landscape and has already destroyed the community – it is no longer the small friendly market town. Aside from that Aylsham's local amenities aren't able to cope with the current population. Along the pollution and congestion extra traffic will add.</p> <p>I know that making additional revenue for the council means that the development will go ahead – but stop and think what you are actually doing – the continuing development is having a negative environmental in pact. The houses can't even be bought by local residents as house prices are too high.</p> <p>Please stop before it is too late and the damage is done.</p> <p>We need to be heard and have a say on this.</p>
06/03/2021	16	Nicola Dods	N/A	Email	No	<p>The inclusion of this expensive bit of road in the gnlp is incompatible with the climate change statement . Norwich and norfolk could be the cycling capital of the UK if such money was spent on cycleways. Cars must give way to cyclists for cycleways be safe.</p>
07/03/2021	17	Mireille Heald	N/A	Email	No	<p>Regarding the inclusion of the Norwich Western Link in the GNLP.</p> <p>This is in contradiction to climate change statement and its inclusion in the plan is therefore unsound.</p> <p>The NWL also has insurmountable planning issues to overcome with Wensum SAC and Habitats Regulations</p> <p>The plan is unsound as there is no clear plan on climate change, and there is no carbon budget for the area</p> <p>The plan for greatly increased housing numbers, beyond government requirements, and beyond what is environmental sustainable is unsound.</p>
07/03/2021	18	Jane Peabody	N/A	Email	No	<p>I am writing to inform you that I do not believe the GNLP draft proposal under Regulations 19 for the above is legally compliant.</p> <p>The reason for this is that the information (and display in Aylsham Town Hall) under Reg 18 consultation only referred to plans for one site of 300 new homes. However under the GNLP draft proposal under Reg 19 it is now proposing two sites for Aylsham with a total of 550 new homes.</p> <p>This means that we, the residents of Aylsham, have not been consulted on this additional site. I also understand that Aylsham Town Council have not been consulted on the additional site either.</p> <p>I also believe that Reg 19 has failed to consider the fact the Infrastructure in Aylsham is already struggling to cope with the increase in residents that has already occurred following the Willow Park and Bure Meadows developments. In particular this has affected the medical and dental practices, roads and utilities.</p>

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						In addition there will be an increase in the town's carbon footprint.
08/03/2021	19	Lorraine Trueman	Mattishall Parish Council	Email	No	I write to you on behalf of Mattishall Parish Council, who wish to comment on the above. Mattishall Parish Council endorses the views submitted by the Norfolk CPRE.
08/03/2021	20	Daphne Eley	N/A	Email	No	<p>I am writing with reference to the above regulation with the deepest concern. Aylsham is on the precipice of being ruined by over development without any infrastructure planned, which makes no sense whatsoever.</p> <p>Having read the response by Aylsham Town Council, I would like to say, I back them whole heartedly on their opinions and share their concerns.</p> <p>It would appear there is total disregard of inevitable problems we are likely to experience with supplies of services, not to mention the sewage difficulties which will become impossible. For years this has been an ongoing problem.</p> <p>The roads are already unsafe for pedestrians, many roads without even a footpath or hardly wide enough for two vehicles to pass and yet you want to increase the number of cars in the Town and endanger the residents even more.</p> <p>It is hard to believe that this latest plan which seems to have been passed without either the Town Council or residents being consulted, has been put together by someone who can't possibly know Aylsham otherwise it would never have been proposed. It is ludicrous. I myself was born and bred in Aylsham, as were my parents, Grandparents and Great Grandparents. Many residents are not prepared to stand by and see our precious historical Town destroyed by those who have no care and are only interested in building new developments without any consideration for the quality or safety to those who reside in Aylsham.</p> <p>I object to this proposal but I have every confidence that common sense will prevail when someone from Norwich visits Aylsham. The first obstacle will be locating somewhere to park their car so I would suggest they come on the bus. When walking the streets, and see they are risking life and limb, they might actually become aware of some of the problems for themselves, and then they may begin to understand.</p>
08/03/2021	21	Jo Ewles-Belton	N/A	Email	No	<p>Further to my previous email of the 23rd of February 2020 in reference to the development of Reedham GNLP3003. Next phase of considerations I hear by resubmit my objection again especially in the case of the proposed planning for Mill Road Reedham and my concerns for the development in the village And I'm most concerned to find that after more than 50 objections on both of the main sites in Reedham they are still being considered for redevelopment</p> <p>And the policies and requirements and the lack of infrastructure go against all the specifications from the highway agencies and planning departments and access requirements are not met and cannot prove safe access to the development and yet they are still being put forward for development I find this most unusual and concerning that this is still being pushed forward ...but to who's benefit ? Certainly not the Reedham community after the large amount of objections.</p> <p>Why is the community and Village voice not being heard but ignored.</p>

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09/03/2021	22	Melanie Eversfield	Blofield Parish Council	Email	Yes	<p>GNLP2161 – Blofield – Norwich Camping and Leisure Speed reduction measures along Yarmouth Road Provision of a safe crossing point to facilitate this and the other existing developments to cross the Yarmouth Road safely. Where would the existing storage for Norwich Camping be relocated to and what impact would that have. Cucumber Lane roundabout issues? The data we have from our SAM sign demonstrates there is a serious issue with speeding on Yarmouth Road and so would welcome and speed restrictions that could be introduced should this proposal be added to the local plan.</p> <p>BLO1 – could this existing land be repurposed for an allotment site given the loss of allotment space at the other end of Blofield due the A47 works, should the existing schemes for Employment area, Pub and Supermarket not be forthcoming. Cannot accommodate additional housing in the area due to the knock of effect of various developments already passed with the impact to the cucumber lane roundabout traffic flows.</p> <p>BLO5 – Bennetts. Existing concerns around this site and the ongoing flooding that has been experienced by local residents as a result of the recently passed Dawsons Way development and Highways works. This proposal seeks to drain into the same blind ditch system which is not fit for purpose and cannot be used. Taken from planning papers November 2019 in application 20190844 5.27 Members will note from the representations that on the advice from the LLFA an attenuated surface water network from the Bennetts Home site further east has been agreed to be discharged into the blind ditch system. The LLFA have admitted the advice given on the at site was not correct.</p> <p>GNLP1048R. Blofield Business Park has recently expanded into some of the land outlined on the proposal. Has this been factored into the production of this plan? Drainage concerns as the ditches are always full / overflowing on Woodbastwick Road and we fear that this would further exacerbate the existing flooding issues. How to address the very serious speeding concerns of local residents – would want to see physical speed restrictions applied to reduce the speed of vehicles accordingly at both entry points (near Renenergy and Heathlands – change speed limit to 20MPH and install speed humps?) Footpath linking Blofield Heath to Blofield (where the Doctors Surgery is located) ought to be factored in to provide proper and safe pedestrian access to facilities and services located in Blofield. Pedestrian crossing to facilitate safe access to Hemblington Primary school to be provided. SAM Data</p>
11/03/2021	23	Lisa Kimber	N/A	Email	No	I strenuously object to resolution 19 of the GNLP which involves developing new homes on the land behind Aylsham Lodge in Aylsham. I am aware that the residents of Aylsham and the Town Council have not been consulted on the proposals and there are serious concerns about the infrastructure of Aylsham not being able to cope with the increased amount of households in Aylsham.
11/03/2021	24	Mary Forest-Hill	N/A	Email	No	As a resident of Aylsham & surrounding district I would like to object to resolution 19 of the Greater Norwich Local Plan which involves the land behind the Aylsham Lodge. The residents of Aylsham, local Parish councils and the Town Council have not been consulted.
11/03/2021	25	Hazel Jones	N/A	Email	No	I was appalled recently to hear that you had not consulted Aylsham Town Council regarding Regulation 19 of the GNLP, this is supposed to be a democratic country and they are the residence representatives and should be consulted. I am aware of the consultation we as residents can do online but your website is not fit for purpose you seem to have made it so difficult to negotiate that no one can complain. Well I am. I am sick of you and Broadland Councils over riding what the residents and Town Council say and I most definitely do not want to become a suburb of Norwich, so hands off stop building more and more properties taking all our countryside. There are loads of brown field sites in and around Norwich you should be developing them not take cheaper option. You also should not allow Buikders to ride rough shot over you. I would like explanation as to why you have not consulted our Town Council. I also strongly object to your planning proposals for Aylsham, hands off our town.
11/03/2021	26	Fiona Hirst	N/A	Email	No	I am extremely concerned about the proposed new housing developments on the south side of Aylsham. Quite apart from the lack of infrastructure I do not think that Aylsham can sustain such an increase in population. However, my main concern is that I am not sure that we the residents have been properly consulted and in particular has due diligence been conducted in relation to water supply. On the north side of Aylsham there are a number of houses dependent on private water supplies from bore holes and one or two who only have wells. What will be the consequences of the increase in abstraction from the aquifers to supply so many houses all requiring baths, showers, washing machines etc. We cannot be left without water and we cannot just be connected to the mains supply. I think there needs to be further proper consultation with the residents of Aylsham before the second plan for the site next to the old motel and the motel site itself is permitted to be developed.

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13/03/2021	27	Michael Binks	N/A	Email	No	<p>Please may I submit my comments regarding the reg 19 plans for Aylsham.</p> <p>Whether this follows any sort of legal framework or not, for the people of Aylsham to not be consulted over this is simply unacceptable. Any consultation must be open, transparent and allow for the people to be fully informed about the proposed development. This does not appear to be the case. Any development of this nature is about people, yet the people are not being given the opportunity to voice their concerns.</p> <p>While there may be an ever increasing need for housing, developments must be located appropriately and not simply slapped up in any green area. Aylsham has seen significant growth and I believe the majority of residents believe it has reached capacity without major consideration and investment in infrastructure before any further growth in the future.</p> <p>Essentially, Aylsham is a medieval market town and has fixed limitations on parts of it's infrastructure. The roads within the town are narrow and not suitable for improvement.</p> <p>The infrastructure is bursting now.</p> <p>There is a chronic shortage of parking.</p> <p>With a national shortage of Gp's, our two surgeries are struggling now. There is not one single NHS dentist in Aylsham.</p> <p>The schools are almost at capacity. There is a farcical lack of accessibility in terms of sustainable transport. For example, new bus stops were built along Henry Page Road, but no footpaths to access them. Pedestrian and cycle access to the town from Willow Park (A new development) is poor. Improvements to the marriots way in terms of surfacing and lighting have not materialised.</p> <p>On street parking has reached a critical point where most roads within the town are now reduced to single carriageway. Traffic outside the schools generally goes unchecked, as we never see the parking patrols that are supposed to regulate this. Areas of the town are decaying and lacking in any investment. For example, the Tesco end of the Marriots Way which is more like a wasteland than the gateway to not only the marriots way itself but also the town.</p> <p>The town is fortunate that it's shops tend to thrive but the supermarkets are small and parking is at a premium.</p> <p>To sum up, I vehemently object to any development in Aylsham until the impact of this on local infrastructure and services has been investigated and addressed.</p> <p>I also vehemently object to developments being 'snuck in' under the radar (reg 19) without being given the opportunity for full and open consultation.</p> <p>Any development must be in the right place, taking into account the impact it would have on the people, the environment and the wider infrastructure.</p>
13/03/2021	28	Keith McNaught	N/A	Email	No	<p>GNLP0354R Land at Johnson's Farm Wymondham</p> <p>Thank you for the opportunity comment as part of the Regulation 19 Consultation. I note that 2 new sites providing 150 new houses include 100 new houses on 5.39ha on Land at Johnson's Farm GNLP034R.</p> <p>This allocation is on a larger scale than a previous consultation on a preferred allocation (GNLP 0354) which restricted development to 2.34ha in recognition that most of the site in which this allocation sits was considered in the strategy preparation to be unreasonable due to the impact on the setting of Wymondham Abbey and associated landscape.</p> <p>The concerns that I expressed at the time of the consultation on the proposed 50 homes on 2.3ha remain and these concerns are increased by the larger scale of the now proposed allocation of 100 homes on 5.39ha. Even though access is required to be from London Road with an access to Abbey Road or Preston Drive, there will inevitably be an impact on Bradman's Lane, Cavick Road and Becketswell Road, and access to the Town from the south west. These highways already carry traffic at a volume, size and speed that is hazardous to the properties fronting Cavick Road, and hazardous to all road users, including those who value this part of Wymondham for quiet and recreation in walking, cycling and the enjoyment of the countryside. Further increase in traffic would have a significant impact on the asset this area provides for Wymondham and its visitors.</p> <p>I would therefore ask that GNLP 0354R is not included as a preferred housing allocation in line with your stated objectives of protecting and enhancing the built, natural, and historic environments.</p>
14/03/2021	29	Chris and Sue Gowman	N/A	Email	No	<p>I write to oppose Regulation 19 changes as they relate to increased development of 550 homes in Aylsham. The Regulation 18 consultation related to c300 homes, to increase this number to 550 is an abuse of process where the full implications for local infrastructure and services has not been given due consideration.</p> <p>I am surprised and disappointed that my County Authority has chosen to behave in this way, there has been significant local housing development in Aylsham in recent years, I was a prime mover as the then Chairman of Aylsham Football Club for the Development at Youngs Park, however there are clear and obvious huge pressures now on local services which are unable to properly serve the existing community, particularly health services, schools and traffic, I ask that you reconsider this matter.</p>
15/03/2021	30	Ruth Claxton	N/A	Email	No	<p>I am a resident of Buxton Road, Aylsham, and am concerned about the unexpected proposed development as part of the greater Norwich local plan, for another development of 250 houses, a school and a care home, which give access along Buxton Road.</p> <p>There have been, to my knowledge no consultations on this proposal,</p> <p>Buxton Road is not a suitable route to carry that amount of additional pedestrian and vehicular traffic. There is a dangerous bend at the Norwich Road end of the street and most of the road has no pavement on either side and no space to add them. How can a proposal like this just appear, without giving any form of public consultation. I am not apposed to a development, but the access needs to be via Norwich Road or the bypass, not down an unsuitable road. As it stands, the proposed school and carehome would attract and unacceptable amount of traffic to Buxton Road as well as the proposed new homes.</p>
04/05/2021 (Written 19th and 26th March 2021)	32	Rodney Edrich	N/A	Post	Yes (written response)	<p>26th March 2021</p> <p>Dear Sir/Madam,</p> <p>I sent the enclosed letter to Norfolk County Council re: the "rape" of Acle apparently it should have sent a copy to you as clearly they see you as implicit in their perfidy!</p> <p>It must be said that any kind of "planning" is something of a rarity these days! A house has been built in the garden at the side of a semi-detached Edwardian property on the New road in Acle. It is so clearly "not right" that the entire village is up in arms about it. Clearly it is your intent to completely destroy the villages and countryside</p>

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						<p>of East Norfolk. - Sad, Yours faithfully, Rodney. 19th March 2021</p> <p>Dear Sirs, During the past few days, I have been looking at the proposal to build hundreds of new houses around the village of Acle, between now and 2038. I look at the suggestion with incredulity. It seems to be that neither the Parish Council or the Broadland District Council have a ghost of an idea as to what they are about. I was brought up and educated in the village and returned to live in it when I retired in 2006. Yes, Acle has a rail service and a very good bus service but there is little else to support the kind of the development proposed. There are no banks (there were three a few years ago), at this moment no viable public house, a Co-op which is incredibly expensive two undertakers, three hairdressers, a florist and two estate agents. The place needs a greater diversity of shops. No fewer than 48 apartments are being built on the former Herondale site. Consultation was attempted re: this but the county council continued against much local opposition.</p> <p>As far as I can see there has been no attempt to consult the villagers again about their enormous proposed development to the west of the village. It is morally wrong to try to tout for approval in the midst of a pandemic when people cannot view the plan properly or form reasoned opinion!</p> <p>Yes, Acle has schools, but there are few proposals to extend these in order to accommodate the number of new pupils which are to be expected. The same is true of the medical centre. With 48 new households of elderly people already being built in its vicinity and the making of an appointment nigh impossible for those who already live here. The strain/imposed by the imposition of 400 more household's area difficult to imagine.</p> <p>Then there is the ongoing matter of the road structure. No attempt has been made to explain the proposed development in terms of the proposed changes to be made to the A47 on the outskirts of the present village, an accident black spot for many many years.</p> <p>Clearly little thought has gone into any of this. Brundall and Blofield have already been developed with no regard to the parishioners. There is no village centre in these places no attempts to build a proper community. All these places have simply become dumping grounds for commuters from Norwich who have no interest at all in the communities in which they live. In some respect I believe, and I can hardly believe it, Acle is already regarded as an area of deprivation.</p> <p>Considerations should have been made. The councils need to work together. It is a greater irony that while Norfolk County Council is prepared to use its land holding to promote all this absurd overcrowding it was unable to provide a couple of acres for a new cemetery to bury the dead of the parish!</p> <p>None of this is satisfactory I urge all concerned to think again I remain, Yours faithfully,</p>
General comments						
12/03/2021	<u>31</u>	Michael Jordan	The Norwich Society	Email	Yes	<p>Please find attached the Norwich Society's formal response to the Regulation 19 Pre-Submission Draft Plan. Our response includes, firstly, an overall commentary on the Draft Plan in the form of a letter and, secondly, a formal representation on one aspect of the Draft Plan, using the pro-forma specified.</p> <p><i>The formal comments have been processed on Opus Consult. The informal PDF is only processed on this log. See attachment for informal comments.</i></p> <p>As the letter makes clear, the Norwich Society believes the Draft Plan, taken in the round, is an appropriate strategic response to the challenges and opportunities that Greater Norwich faces. However, we do believe that Policy 3 is inconsistent with national policy as currently drafted and therefore unsound in this respect. We trust that this matter will be rectified before submission to the Secretary of State.</p>