



Broads Authority response to Greater Norwich Local Plan examination
Matters, Issues and Questions part 2.
January 2022

Matter 12, question 3, relating to d. Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way (Ref CC16)

Wording like that at 2.134 needs to be included in the supporting text for CC16: *'2.134 The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority'*. Considering what is written at 2.134 in support of policy CC7 and considering the similarities in the location of site CC7 and CC16, it seems logical to be consistent and include the Broads Authority as suggested. It is not clear why there are differences throughout the document and this change is minor in nature and can be easily addressed. This relates to the soundness tests as follows:

- 'effective' as the effect of the site on the Broads is a cross boundary issue.
- 'consistent with National policy' as it would ensure the Local Plan addresses Para 176 of the NPPF in terms of ensuring the setting of the Broads is addressed.

This policy does not mention about making most of the riverside location like other policies (for example at GNL0360/3053/R10, GNL0401, CC4b, CC7 and R31) although it is mentioned at para 2.192 (but not in the policy). 0401 and GNL0409AR for example have good wording in point 1 that can be used or adding something similar to point 5 of CC7 which says *'Development will be of a scale and form which respects and takes advantage of its riverside location, providing high quality landscaping, planting and biodiversity enhancements particularly along the river edge'* to the policy would be consistent with other similar policies as well as relate to these soundness tests:

- 'effective' as the effect of the site on the Broads is a cross boundary issue.
- 'consistent with National policy' as it would ensure the Local Plan addresses Para 176 of the NPPF in terms of ensuring the setting of the Broads is addressed.

Matter 12, question 3, relating to i: Land adjacent to the River Wensum and the Premier Inn, Duke Street (Ref GNL0068)

As part of point 1, refer to the scheme making the most of its riverside location, as is stated in other policies. This is a matter of consistency. 0401 and GNL0409AR for example have good wording in point 1 that can be used. It is not clear why this wording is in most, if not all other river side policies and not this one. This may simply be a drafting error. This would make the plan consistent. This relates to the soundness tests as follows:

- 'effective' as the effect of the site on the Broads is a cross boundary issue.
- 'consistent with National policy' as it would ensure the Local Plan addresses Para 176 of the NPPF in terms of ensuring the setting of the Broads is addressed.

Paragraph 2.30 – we support the fact that early engagement with the Broads Authority is recommended, but not clear why the only reason given is flood risk as there other reasons. Or does that part of the sentence only refer to AWS? It may need clarifying that in general, given its location, early engagement with the Broads Authority is recommended, rather than just saying to do with flood risk.

Matter 12, question 3, relating to the Urban fringe

Para 3.75 – last sentence, amend as follows ‘the Church of St Andrew and its ruins’ – as both the church and ruins are listed – this is a factual update.