Main Modifications – Annexes, Changes to Maps and Supporting Documents.

## **Annexes:**

**Annexe 1 Monitoring Framework** 

| Respondent                         | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent?   | GNLP Partnership response   |
|------------------------------------|--------|--------------------------------|---|---|---|
| Dr. Nigel<br>Hargreaves<br>[20707] | 25286  | Comment                        | 1/ Given how important achieving the stated target is to the whole of the GNLP, the definitions of 78% reduction in GHG emissions by 2035 and Net Zero by 2050, should warrant explicit carbon equivalent (CO2e) budgets over 5 year intervals to correspond to a reduction pathway that connects current and future versions of the GNLP.  This would also align better with national policy to DRIVE carbon reduction and monitoring, rather than only support retrospective actions as currently set up in SGS8. | The monitoring framework should drive carbon reduction and contain clear 5-year reduction targets to measure whether it is meeting the 78% reduction in GHG emissions by 2035 and Net Zero by 2050. | Comment noted. This issue was discussed at the plan's hearings and it is not considered necessary to amend indicator SGS8.  The plan's policies as a whole provide for sustainable growth which, along with national measures on carbon reduction, are intended to contribute to meeting national zero carbon targets.  The climate change monitoring in SGS8 uses the government's annually produced data for each of the three districts.  The targets in the plan are intentionally linked to those of the government to reflect |

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|------------------------------------|--------|--------------------------------|--|---|--|
|                                    |        |                                |  |   | the fact that national targets can change, so it is appropriate that Greater Norwich should contribute to those national targets. This reflects the fact that Local Plan policies for development and land-use can be a significant, but partial, contributor to meeting the national objectives.  A carbon budget is not required for the plan to meet the legislative requirement to contribute to the mitigation of, and adaptation to, climate change. |
| Dr. Nigel<br>Hargreaves<br>[20707] | 25288  | Comment                        | Reference SGS8:  2/ LG Inform data already show a tCO2e increase in Broadland, Norwich and S. Norfolk OVER your baselines - which according to the Trigger for Action would require Action | Yes  The trigger for action should be reconsidered and the plan should limit emissions growth from contributing policies such as transport. | No Change  Comment noted. It is not considered necessary to amend indicator SGS8.  It is acknowledged that the most recent data for 2021 shows a rise in emissions   |

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|------------|--------|--------------------------------|---|-------------------------------------|--|
|            |        |                                | to review policies immediately upon publication of the GNLP!  Following my previous comment (1), given how this local contextual indicator underpins important targets set across the GNLP, it could be better to strengthen the Action to LIMIT emissions growth from other contributing policies within the Plan that evidence shows are already exceeding your District targets.  Connecting this to the scientific evidence shows transport as a major contributor for example. |                                     | locally and nationally due to the impacts of Covid 19 on society. However, the action for this indicator states that "Analysis of the reasons for carbon emissions not falling annually will inform an assessment of the need to review policies". As local plan policies can only have a limited impact on such an international crisis, year on year reductions in carbon emissions to contribute to national reduction targets is still considered to be the best measure to use.  Specifically in relation to transport, the plan has a significant focus on those aspects of transport policy it can most impact on through the location of development and by requiring the design of to promote active travel and public transport use. |

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|------------------------------------|--------|--------------------------|--|---|--|
| Cllr Hannah<br>Hoechner<br>[20710] | 25426  | Comment                  | Table 3 Sustainability Appraisal Indicators -  Inclusion of "rates of active travel (walking and cycling)" as an indicator within the air theme  Inclusion of clear metrics for biodiversity theme - MAGIC mapping, population number of protected species | Yes Include active travel and more biodiversity monitoring. | Active Travel: No change in relation to monitoring active travel. Rates of active travel are only collected based on a national survey which would not assist in monitoring development schemes in Greater Norwich. Indicator SC3 covers sustainability statements which will be required to show how the design of a specific development promotes active travel, S14 covers cycle route provision and the monitoring of individual sites covers infrastructure provision including pedestrian and cycle routes.  Biodiversity: No change in relation to monitoring biodiversity. The 4 plan indicators EPE4 to 7 measure specific issues |

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|------------------------------------|--------|--------------------------------|---|--|--|
|                                    |        |                                |   |  | impacting on biodiversity which are directly impact by the plan's policies. These cover designated natural assets, biodiversity net gain, green infrastructure and visitor pressure on protected habitats. Together with EPE8 on nutrient neutrality and the 3 SA indicators on biodiversity, this is considered to provide a proportionate monitoring framework in relation to the plan's policies. |
| Cllr Hannah<br>Hoechner<br>[20710] | 25424  | Comment                        | Table 3 Sustainability Appraisal indicators  Air: Could PM2.5 pollution be included among the monitoring indicators? Can a target for air pollution be added that indicates whether air pollution levels for PM10, PM2.5 and NO2 are above or below the threshold deemed acceptable for human health by the WHO | Yes  Air: include PM2.5 monitoring and include a specific threshold related to WHO guidelines. | Air: The partnership is supportive of including PM2.5 in the first indicator in table 3 of the Monitoring Framework. It is still considered appropriate to retain the target as "decrease" with annual   |

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|------------|--------|--------------------------------|--|-------------------------------------|---|
|            |        |                                | Climatic factors: "CO2 emissions per capita": this indicator does not capture whether CO2 emissions per capita are decreasing sufficiently fast to stay within a Paris Agreement/1.5°C- compatible carbon budget/trajectory.  Can emissions be mapped against Tyndall/SCATTER carbon budget/trajectory ("green" flag only if pc emissions decrease in line with carbon budget/trajectory)? |                                     | monitoring reports potentially referencing WHO targets.  Climate: This issue was discussed at the plan's hearings and it is not considered necessary to amend indicator "CO2 emissions per capita".  The plan's policies as a whole provide for sustainable growth which, along with national measures on carbon reduction, are intended to contribute to meeting national zero carbon targets.  The climate change monitoring uses the government's annually produced data for each of the three districts.  The targets in the plan are intentionally linked to those of the government to reflect the fact that national targets |

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|---|--------|--------------------------------|--|---|---|
|   |        |                                |  |   | regularly change, so it is appropriate that Greater Norwich should contribute to those national targets.  |
|   |        |                                |  |   | This reflects the fact that Local Plan policies for development and land-use can be a significant, but partial, contributor to meeting the national objectives. |
|   |        |                                |  |   | A carbon budget is not required for the plan to meet the legislative requirement to contribute to the mitigation of, and adaptation to, climate change.         |
| Norwich<br>Green Party<br>(Ms Denise<br>Carlo)<br>[12781] | 25486  | Comment                        | SGS8 Local Contextual Indicator: Per capita carbon emissions In addition to this performance indicator, we would like to suggest: - Number and percentage of | Yes  Include indicators on buildings built to net zero standard and on homes within 5 miles of a railway station. | Potential Change It is not considered proportionate or practical to monitor the number and percentage of new buildings built to net zero standard as            |

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|---------------------------------|--------|--------------------------------|---|--|--|
|                                 |        |                                | new buildings built to net zero standard.  - Number and percentage of new dwellings built within 5 miles of a railway station.  |  | this is not an adopted policy requirement.  The partnership would be supportive of including homes within 5 miles of a railway station as an indicator. This change could be made through an additional modification.  |
| Mr Bryan<br>Robinson<br>[14521] | 25500  | Object                         | I object to these monitoring proposals as lacking objectivity.  Most of the triggers for action and resultant actions are vague, simply requiring analysis to determine whether there is a need for a full or partial review of the Plan.  The monitoring appears to be based on quantity of indicators not quality of information collated.  Some monitoring seems to suggest there will be planning | Yes  General objection to the approach taken on monitoring.  Remove promotion of the Norwich Western Link from policy 4. | No Change  (Additional Modification to SGS7)  The partnership notes the general objections to the approach to the monitoring framework but does not consider that any changes are required in relation to these comments. The monitoring framework is considered to be proportionate and appropriate for the plan. It will allow the effective monitoring of specific plan |

| Respondent R | Rep ID | Support/<br>Object/<br>Comment | Summary of comments  | Any change suggested by respondent?   | GNLP Partnership response  |
|--------------|--------|--------------------------------|--|---|--|
|              |        |                                | approvals which do not comply with the Plan and/or advice from statutory or other professional consultees such as the Environment Agency, Natural England and Norfolk Wildlife Trust (Table 3).  It is assumed that this is only likely to occur if there are overriding other material considerations if decision makers are acting in accordance with NPPF and government guidance.  Norfolk County Council publishes a Local List setting out its material considerations for planning decisions and it is assumed that any material considerations particular to each member of the Partnership will be individually tailored and covered in supplementary documents under this overarching Plan.  The monitoring proposals of | Comments relating to specific indicators:  SGS1 Jobs Growth - This should monitor both the number of jobs annually and where they are provided.  SGS3 Housing Delivery - How does this satisfy NPPF requirements?  SGS7 Brownfield land – there is a mismatch between the indicator which states that at least 22% housing development should be on brownfield land and the main modification's removal of the information of the | policies, whilst also providing more general contextual and SA indicators.  In relation to comments on specific indicators:  SGS1 Jobs Growth – No change as jobs growth data is only available at the district level for this indicator.  SGS3 Housing Delivery - This satisfies the NPPF requirement to establish and monitor a housing trajectory.  SGS7 The mismatch is noted and agreed. An additional modification will be used to restore the reference to the brownfield/greenfield split in the plan. |

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|------------|--------|--------------------------------|---|---|--|
|            |        |                                | the whole area do not reflect any differences for individual authorities. | brownfield/greenfield split from the plan.  SGS8 Per capita carbon emissions – questions how monitoring of per capita carbon emissions relate to the plan target to contribute to the national target to reduce emissions by 78% by 1990 in relation to the 1990 overall emissions.  Should also break down the targets by sectors. | SGS8 Per capita carbon emissions – as many of the initiatives which will lead to the reduction in overall emissions are international, national and regional and are beyond the scope of this plan, the use of overall per capita emissions is considered to be the most appropriate indicator. It is important to note that the target is to reduce per capita carbon dioxide emissions year on year to contribute to meeting the national targets. |
|            |        |                                |   | EPE8 Nutrient Neutrality  – target refers to reduction, policy refers to no increase  | EPE8 Nutrient Neutrality – it is considered suitable that the target refers to a reduction in nutrient levels in protected sites so that sites are no longer in an unfavourable condition, as  |

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|            |        |                                |                     |   | the policy refers to<br>development not adversely<br>affecting the integrity of sites<br>in an unfavourable condition.   |
|            |        |                                |                     | S14 Sustainable Transport – why does this only cover the cycle network  | No change is considered to be necessary. The use of the S14 indicator on linking to the cycle network reflects the importance of cycling connections to promoting sustainable travel and the need to be proportionate concerning the availability of data. |
|            |        |                                |                     | SA indicators:  |  |
|            |        |                                |                     | Air  LTP4 sets annual targets to 2027. The two monitoring regimes should either reflect the same targets or the monitoring should be left to one organisation only. There seems little logic in GNLP monitoring traffic flows on main roads | No change is considered to<br>be necessary. This is an SA<br>indicator which is in line with<br>the overall approach in the<br>SA section of the monitoring<br>framework which aims to<br>provide a clear and concise                                      |

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|            |        |                                |                     | when it is not responsible for transport. Noting the rural aspect of the majority of the Greater Norwich area, it seems illogical to monitor main roads only.  Biodiversity, Flora and Fauna | overview of key sustainability issues.  |
|            |        |                                |                     | If there is a zero target, why is there not a policy stipulating that the advice of Natural England or Norfolk Wildlife Trust or the Broads Authority must be followed?                      | No change is considered to be necessary. The zero target for biodiversity advice reflects the intention to address any concerns raised. NE, NWT and the BA provide comments to the LPAs, but unless it concerns a legal matter, that advice is not binding. This is because the LPA has the responsibility for making planning application decisions and must take account of comments from a broad range of respondents. |

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|------------|--------|--------------------------------|---------------------|---|--|
|            |        |                                |                     | The promotion of the Norwich Western Link should be removed from the Development Plan as was my understanding from the Partnership's reply to the Inspectors first set of questions.  | No change is considered to be necessary. The partnership stated that no allocations in the plan rely on the delivery of the NWL. The policy covers strategic infrastructure projects which are being progressed by Norfolk County Council and other partners to promote regional connectivity. It is considered appropriate to show these significant projects in order to provide context for the plan. |
|            |        |                                |                     | Renewable energy generation. The indicator targets an increase and cross references this to indicator SC5 which notes that no action is proposed. The monitoring of this indicator misses the crucial issue of solar farms resulting in the loss of productive agricultural land. | No change is considered to be necessary. Both Policy 2 and the monitoring framework reflect the NPPF which support renewable and low carbon energy and associated infrastructure, including solar energy.  |

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|------------|--------|--------------------------------|---------------------|---|---|
|            |        |                                |                     | Environmental considerations should monitor not only the extent of renewable energy created (presumably recorded in values of energy output) but also acreage of various grades of agricultural land lost.              |   |
|            |        |                                |                     | There is a growing concern that solar farms are similar to onshore wind turbines relating to the loss of agriculture. Is there a need for similar restrictions in Policy 2 – Sustainable Communities for local support? |   |
|            |        |                                |                     | Population and material assets - Number of affordable housing completions. This indicator targets an increase, but cross references to H1 which requires the affordable   | Population and material assets – No change is considered to be necessary. The increase in the number of affordable housing completions is in line with the overall approach in the SA section of the monitoring |

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|---|--------|--------------------------------|--|--|---|
|   |        |                                |  | housing percentages to<br>be maintained. These<br>indicators should be<br>aligned.                 | framework which aims to provide a clear and concise overview of key sustainability issues. Indicator H1 will provide more information on this key policy issue.   |
| Norfolk<br>Wildlife Trust<br>(Dr Sarah<br>Edlington)<br>[20730] | 25509  | Comment                        | Table 3 Sustainability Appraisal Indicators  We suggest including "rates of active travel (walking and cycling)" as an indicator within the air theme, with a target to 'increase'. This will demonstrate policy effectiveness of policy 2 'sustainable communities.  We recommend that the percentage loss of the ecological network indicator within the biodiversity, flora and fauna theme needs revision, as it has no metric to measure it by at present. We suggest that this monitoring target covers the extent of priority habitats (as measured on MAGIC mapping) as an | Yes  SA Indicators- Include  • rates of active travel  • percentage loss of the ecological network | No Change  Active Travel: No change in relation to monitoring active travel. Rates of active travel are only collected based on a national survey which would not assist in monitoring development schemes in Greater Norwich. Indicator SC3 covers sustainability statements which will be required to show how the design of a specific development promotes active travel, S14 covers cycle route provision and the monitoring of individual sites covers infrastructure provision |

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|------------|--------|--------------------------------|---|-------------------------------------|--|
|            |        |                                | interim metric. This can be revisited this once the Nature Recovery Network map is completed. |                                     | including pedestrian and cycle routes.  Loss of the Ecological Network: No change in relation to monitoring loss of the ecological network. The 4 plan indicators EPE4 to 7 measure specific issues impacting on biodiversity which are directly impact by the plan's policies. These cover designated natural assets, biodiversity net gain, green infrastructure and visitor pressure on protected habitats. Together with EPE8 on nutrient neutrality and the 3 SA indicators on biodiversity, this is considered to provide a proportionate monitoring framework in relation to the plan's policies. |

## **Changes to Maps**

**MAP3- Norwich settlement maps** 

| Respondent   | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent?   | GNLP Partnership response  |
|--|--------|--------------------------------|---|---|--|
| Stantec (Miss<br>Anne<br>Kenchington,<br>Planner)<br>[20727] on<br>behalf of<br>Wain Estates<br>(Mr Nicholas<br>Mills,<br>Strategic<br>Planning<br>Manager)<br>[20729] | 25494  | Comment                        | If the Inspectors are minded to allocate or reinstate GNLP0581/2043 as a Contingency Site, then the Policy Map needs to be revised and updated accordingly. | Yes Update map 3 to include site GNLP0581/2043 if a decision is made to allocate this site, or if it is reinstated as a contingency site. | No Change Comment noted. These issues (related to MM13) were discussed through the examination and the Inspectors have proposed modifications to ensure the plan is sound based on the evidence presented. |

**MAP4– East Norwich Focus Map** 

| Respondent  | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent?   | GNLP Partnership response  |
|---|--------|--------------------------------|---|---|--|
| Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415] | 25522  | Comment                        | Amendment to Policy map for GNLP0360/3053/R10 that part of the allocated Utilities Site is in the Broads Authority. | Yes The map needs to show the part of the Utilities Site that is in the Broads Authority. | For the benefit of showing the entire East Norwich Strategic Regeneration Area allocation, including the part of the Utilities Site that falls within the Broads Authority, a change to the map is supported by the Partnership. |

MAP32- GNLP0132 Focus Map

| Respondent   | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent? | GNLP Partnership response  |
|--|--------|--------------------------------|---|-------------------------------------|--|
| Rackheath  | 25292  | Comment                        | The amendment says that   | Yes                                 | Change required  |
| Parish<br>Council<br>(Parish Clerk,<br>Clerk)<br>[12989] |        |                                | residential development<br>numbers will be revised from<br>1,200 to a range of 1,000 -<br>2,000. We believe the range<br>should be 1,000 to 1,200<br>homes. | Make correction to map description. | Comment noted.  Make factual correction  The update mistakenly reads 1,000-2,000. As highlighted by Rackheath Parish |

|  |  | Council, this should in fact |
|--|--|------------------------------|
|  |  | read 1,000 - 1,200.          |
|  |  |                              |

MAP48- Cantley settlement map

| Respondent  | Rep ID | Support/<br>Object/<br>Comment | Summary of comments                                    | Any change suggested by respondent?                        | GNLP Partnership response   |
|---|--------|--------------------------------|--|--|---|
| Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415] | 25526  | Comment                        | Show the Broads Authority for consistency and context. | Yes Show the Broads Authority for consistency and context. | No Change The Partnership has already identified this modification and proposes to add the Broads Authority area. |

MAP53- Coltishall settlement map

| Respondent  | Rep ID | Support/<br>Object/<br>Comment | Summary of comments                                    | Any change suggested by respondent?                        | GNLP Partnership response   |
|---|--------|--------------------------------|--|--|---|
| Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415] | 25527  | Comment                        | Show the Broads Authority for consistency and context. | Yes Show the Broads Authority for consistency and context. | No Change The Partnership has already identified this modification and proposes to add the Broads Authority area. |

MAP60- Horsham St Faith settlement map

| Respondent  | Rep ID          | Support/<br>Object/<br>Comment | Summary of comments  | Any change suggested by respondent?   | GNLP Partnership response  |
|---|-----------------|--------------------------------|--|---|--|
| Lawson Planning Partnership [20713] on behalf of Horsham Properties Ltd [16997] | 25473/<br>25474 | Object                         | The amendments proposed as part of Main Modification MAP60 are not reflected on the revised Settlement Map, which still excludes the Block L units, the proposed allocation and the western bund from the settlement boundary. | The proposed employment allocation SL2007/GNLP4061/HNF3 boundary requires amendment to reflect the Horsham and Newton St Faith Site Allocation Focus Map. | As outlined in MAP60 the Horsham St Faith Settlement Map will be amended to reflect changes to the boundary of site HNF3/SL2077/GNLP4061. Existing settlement boundaries are not being amended through the GNLP. No change is proposed by the Partnership. |

MAP72- GNLP5004R Focus Map

| Respondent                         | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent? | GNLP Partnership response   |
|------------------------------------|--------|--------------------------------|---|-------------------------------------|---|
| Miss Simone<br>Emmerson<br>[20255] | 25404  | Object                         | There will be a negative impact on the environment, such as loss of habitat for nesting birds and bats, removal of hedgerows and a large established oak tree. There will be loss of privacy to an adjacent property, harm to | No                                  | No Change  The constraints of the site have been assessed through the examination process and it is now proposed to reduce the allocation from 4 pitches to 2 pitches. Constraints to |

visual amenity, and harm to do with the environmental, the rural character of the area. highway, local character, flood risk, compatibility with Highway access to the site is neighbouring uses, and the unsuitable and cannot be site's planning history have all been considered. made. There is very limited visibility exiting onto the road. GNLP5004R remains one of The site has a medium to high the favoured sites available ground water vulnerability and and proposed modifications the road floods quite badly. will ensure the policy is sound. There is no safe footpath or safe access to public transport to reach amenities in Cawston, and is rated in assessments as 'amber'. The site is disconnected from services and the closest GP surgery is 3.6 miles away. Compatibility with neighbouring uses is rated as 'amber', and no changes are proposed to make it rated 'green'. A previous planning application was refused for one residential dwelling in 2019, the site has not changed since then, and there is still a 'lack of need for development in the area'.

| facilities, and not meeting the | The Parish Council objected to the proposal to develop the site, as did the District Council for reasons of it being outside the development boundary, it not being sustainable due to the access to services and |
|---------------------------------|---|
|                                 |   |
|                                 | criteria as an 'exception' site.  |

MAP79- GNLP0528A &B Focus Map

| Respondent   | Rep ID | Support/<br>Object/<br>Comment | Summary of comments  | Any change suggested by respondent?   | GNLP Partnership response   |
|--|--------|--------------------------------|--|---|---|
| Serruys Property Co. Ltd (Mr Richard Cubitt, LP Contact) [12917] | 25470  | Comment                        | We continue to support the allocation of 12 residential pitches for Gypsies and Travellers at Strayground Lane, Wymondham. | Yes  Notwithstanding our support, the allocation should not be restricted to 12 pitches given there is potential for more pitches to be accommodated on site. | No Change  The number of pitches was discussed through the examination and allocating GNLP5028 A/B for approximately 12 residential Gypsy and Traveller pitches is considered the correct approach based on the evidence presented. |

MAP81- Policies Map booklets

| Respondent   | Rep ID | Support/<br>Object/<br>Comment | Summary of comments          | Any change suggested by respondent? | GNLP Partnership response |
|--------------|--------|--------------------------------|------------------------------|-------------------------------------|---------------------------|
| Hingham      | 25389  | Comment                        | Please note that the Hingham | No                                  | No Change                 |
| Town Council |        |                                | Neighbourhood Plan is now    |                                     | Comment noted             |
| (Town Clerk) |        |                                | close to submission stage.   |                                     | Comment noted             |
| [12974]      |        |                                |                              |                                     |                           |

## **Supporting Documents**

Sustainability Appraisal

| Respondent                                     | Rep ID | Support/<br>Object/<br>Comment | Summary of comments  | Any change suggested by respondent?   | GNLP Partnership response   |
|--|--------|--------------------------------|--|---|---|
| Norwich<br>Green Party<br>(Ms Denise<br>Carlo) | 12781  | Comment                        | The SA of Updated Policy 1 The Sustainable Growth Strategy paints a worrying picture that overall, a major negative impact on climate change mitigation and adaptation would be expected.  This assessment ought to trigger alarm bells and lead the GNDP to conclude that the quantum of housing, its spatial distribution and its designs are unsustainable.  Yet, the GNDP ignores the projected 24% increase in annual carbon emissions from new dwellings. It fails to show how the 24% increase is consistent with the nationally determined target of cutting emissions by 68% by 2030, and legally binding | No specific changes are requested in relation to the main modifications, though the response is clear that the GNLP should contain less growth overall, less of that growth should be in rural areas and development should be zero carbon. | No changes to the main modifications are considered to be necessary in relation to the comments.  The issue of the amount of growth in the plan, its location and its design was discussed in detail at the plan's examination.  The NPPF requires the plan to meet the area's objectively assessed growth needs with a buffer to ensure delivery of needs. The modified version of the plan contains an 11% buffer, slightly above 10% standard buffer used in local plans.  Some growth in villages is necessary to promote the |

| Respondent R | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent? | GNLP Partnership response  |
|--------------|--------|--------------------------------|---|-------------------------------------|--|
|              |        |                                | national targets of 78% by 2035 and Net Zero by 2050. It fails to acknowledge that this is a problem in a county that is highly vulnerable to climate change. It fails to consider what necessary action and policies are necessary for radically reducing rather than increasing GHG emissions.  The GNDP has made the situation worse by allocating unsustainable levels of new housing in rural areas, particularly in South Norfolk.  If the GNDP proceeds to adoption of the GNLP as it currently stands, it will make the local contribution to climate change worse and not better.  The Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their |                                     | retention of services which can be beneficial in relation to climate change as further service loss will lead to more need to travel for village residents.  The plan will contribute to meeting national carbon reduction requirements, including through the national commitment to the Future Homes standard to significantly increase energy efficiency in development.  Overall, the plan contains a broad range of policies as set out in its climate change statement to reduce per capita emissions. This reduction will be supported through the design of development required by Sustainable Communities Policy 2 in the GNLP Strategy. The policy covers a broad range of issues |

| Respondent | Rep ID | Support/<br>Object/<br>Comment | Summary of comments  | Any change suggested by respondent? | GNLP Partnership response   |
|------------|--------|--------------------------------|--|-------------------------------------|---|
|            |        |                                | Local Plans "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change".  A number of parties including the Green Party objected to the Regulation 19 plan submission on grounds that the policies would not contribute to the mitigation of and adaptation to climate change as required by S19 (1A) of the PCPA 1990 above. The GNDP disagreed, despite lacking evidence to show otherwise.  Changes in per capita emissions shown in Joint Core Strategy Annual Monitoring reports have been painfully small especially in relation to transport in South Norfolk. On top of this, the |                                     | related to climate change including access to services and facilities, active travel, electric vehicles, use of sustainable sources of energy, water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.  Furthermore, the plan aims to significantly boost employment in businesses which can play an important role in tackling climate change locally, nationally and internationally. |

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|--|--------|--------------------------------|--|---|--|
| Historic<br>England (Mrs<br>Debbie Mack,<br>Historic<br>Environment<br>Planning<br>Adviser)<br>[19652] | 25370  | Support                        | GNLP would result in an annual aggregate increase in emission levels. Clearly additional measures are required to achieve radical cuts changes in emissions such as ensuring all new homes are built to net zero standards and locating new homes close to rail and public transport hubs.  Paragraph 6.1.24 of the Sustainability Appraisal should be amended to reflect the new listings on the Carrow Works site. | Yes Update paragraph 6.1.24 of the Sustainability Appraisal | Potential Change Factual update to be completed. |

**Habitats Regulation Assessment** 

| Respondent   | Rep ID | Support/<br>Object/<br>Comment | Summary of comments   | Any change suggested by respondent? | GNLP Partnership response |
|--|--------|--------------------------------|---|-------------------------------------|---------------------------|
| Natural<br>England (Ms<br>Louise Oliver,<br>Planning and<br>Biodiversity<br>Advisor) | 13804  | Support                        | Within the HRA the appropriate assessment concludes 'no adverse effect on integrity' for any of the habitats sites considered and Natural England concurs with this conclusion. | No                                  | No Change Support noted.  |