

Main Modifications – Strategy

Policy	Main Modification reference	Total Number of Representations	Support	Object	Comment
Policy 1 – The Growth Strategy	MM1	1	0	1	0
Policy 1 – The Growth Strategy	MM2	4	0	1	3
Policy 1 – The Growth Strategy	MM7	6	0	2	4
Policy 2 – Sustainable communities	MM8	13	2	4	7
Policy 3 - Environmental Protection and Enhancement	MM9	11	4	2	5
Policy 4 – Strategic Infrastructure	MM10	8	1	3	4
Policy 5 – Homes	MM11	3	0	0	3
Policy 6 – The Economy	MM12	2	0	0	2
Policy 7.1 – The Norwich Urban Area including the fringe parishes	MM13	8	1	4	3
Policy 7.3 – The Key Service Centres	MM15	3	0	3	0
Policy 7.4 – Broadland Village Clusters	MM16	2	0	2	0
Policy 7.5 – small scale windfall housing development	MM17	7	1	5	1
Policy 7.6 – New Settlements	MM18	3	1	0	2
Appendix 6	MM20	2	0	2	0
Total	N/A	73	10	29	34

Policy 1 – The Growth Strategy

Policy	Policy 1 – The Growth Strategy
Total Number of Representations	11 representations from 9 respondents
Support/ Object/ Comment Breakdown:	<p><u>MM1</u> (1 representation) Support: 0 Object: 1 Comment: 0</p> <p><u>MM2</u> (4 representations) Support: 0 Object: 1 Comment: 3</p> <p><u>MM7</u> (6 representations) Support: 0 Object: 2 Comment: 4</p>

Summary of main issues raised:

- MM1
 - Insufficient housing supply. Additional site allocation suggested.
- MM2
 - Recalculate five-year land supply and evidence deliverability.
 - Housing supply too high, delete policy 7.5.
 - Suggested additional site allocation to meet housing needs.
- MM7
 - Clarify numbers in tables and map.
 - Plan should be for the whole county of Norfolk.

- Housing supply and buffer reduction.
- Settlement boundaries should be updated.

MM1 – Paragraph 177

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Wain Estates (Mr Nicholas Mills, Strategic Planning Manager) [20729]	25488	Object	Consider the implications of the impacts of Nutrient Neutrality on Housing Delivery are likely to be significant. <i>“We do not consider that the MM proposed in respect of housing delivery support the Local Plan as an effective one which will achieve housing numbers required”</i> . 5y1s has dropped from 6.05 years to 5.77 years, with a respective drop in plan period housing supply buffer from 22% to 10%. High levels of uncertainty regarding deliverability in the plan period coupled with insufficient flexibility in the size of the buffer results in a risk that the housing need will not be met through the site allocations and proposed trajectory. This uncertainty could be eased by including site GNLP0581/2043 as an allocation or reinstating it as a contingency site which is demonstrated to be	Yes Allocate site GNLP0581/2043 for 800 dwellings, or reinstate as a contingency site.	No Change Objection noted. The issue of Nutrient Neutrality mitigation was discussed through the examination and the Inspectors have proposed modifications to ensure the plan is sound based on the evidence presented. The housing forecast has taken a cautious approach to delivery to accommodate the likely impacts of this issue. The LPAs have been working hard to bring on board mitigation strategies to assist in the delivery of homes with a joint venture company

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			both available and achievable for delivery of 800 homes with the ability to meet a Nutrient Neutrality solution on site.		acquiring credits for sale, and a retro fitting scheme of local authority owned properties in Norwich to enable new consents to be granted. The GNLP will have a five-year land supply upon adoption and a buffer to meet housing need in the plan period. Additional site allocations are not required to meet this need.

MM2 – Table 6

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Pigeon Investment Management Ltd (Mr Rob Snowling,	25495	Comment	The proposed modification to Row A of Table 6 of the Plan to clarify that the figure of 40,541 homes forms the 'housing requirement' is noted. The	Yes The 5-year land supply should be recalculated with the requirement of	No Change The Partnership disagrees with Pigeon Investment's

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Associate Director) [13863]			<p>proposed modification to Row B of Table 6 to clarify that 8,728 homes were built during the years 2018/19 to 2021/22 (4 years) is also noted, as is the</p> <p>proposed modification to Row C to clarify that this leaves (a minimum of) 34,668 homes to be delivered over the remainder of the plan period (2022/23 to 2033/34 – 16 years).</p>	<p>2,025 homes per year, and a 5% buffer added. This would give a requirement of 10,138 homes between 1 April 2023 and 31 March 2028.</p> <p>An update to D3.2D should be provided so that it can be evidenced that all sites being counted towards the 5 year land supply are deliverable.</p>	<p>interpretation of how the 5-year supply should be calculated and that document D3.2D should be updated. The Partnership presented evidence on the housing trajectory in March 2023 and all the evidence presented then has been incorporated into the Main Modifications consultation process. Therefore, there is no need to introduce new evidence to the examination process.</p>
Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	25294	Comment	Hempnall Parish Council (HPC) welcomes the reduction in the housing buffer to 11% on the LHN but says it is still too large and more homes will be delivered than is required by national policy requirements. To reduce the	Yes Policy 7.5 should be deleted.	No Change The standard method should be used to determine the minimum number of homes needed, and the Partnership disagrees

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			buffer further Policy 7.5 should be deleted.		that the 11% buffer should be reduced further by deleting Policy 7.5. As the Strategy says, having a buffer mitigates any risk of non-delivery of sites and the Partnership considers Policy 7.5 to be sound.
CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	25378	Comment	CPRE Norfolk welcomes the reduction in the housing buffer to 11% on the LHN but says it is still too large and more homes will be delivered than is required by national policy requirements. To reduce the buffer further Policy 7.5 should be deleted.	Yes Policy 7.5 should be deleted.	No Change The standard method should be used to determine the minimum number of homes needed, and the Partnership disagrees that the 11% buffer should be reduced further by deleting Policy 7.5. As the Strategy says, having a buffer mitigates any risk of non-delivery of sites and the

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					Partnership considers Policy 7.5 to be sound.
Wain Estates (Mr Nicholas Mills, Strategic Planning Manager) [20729]	25489	Object	<p>The updated Trajectory (Appendix 4, MM20) feeds directly into the MM2 at Table 6 which 'establishes the Plan's total housing potential figures'. This modification maintains a Housing requirement (2018 to 2038) of 40,541, however it includes an amended 'Total Forecast Supply' (previously 'potential') of 45,041.</p> <p>This forecast is reduced from the previous forecast of 49,492 which is in part due to the reduced 'buffer' applied (11%). Comparing the requirement against the forecast supply, this leaves a buffer across the plan period of 4,500 homes (225 homes per year split across the 20-year plan period). It is our view that this buffer is not sufficient to account</p>	<p>Yes</p> <p>Allocate site GNLP0581/2043 for 800 dwellings, or reinstate as a contingency site.</p>	<p>No Change</p> <p>Objection noted.</p> <p>The housing forecast trajectory and deliverability was extensively discussed through the examination. The Inspectors have considered points raised and have proposed modifications to ensure the plan is sound based on the evidence presented.</p> <p>The housing forecast has been informed by evidence provided by site promoters and developers; it has taken a cautious approach to</p>

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			for impact upon supply caused by Nutrient Neutrality coupled with potential (currently unknown and unpredictable) market and political/policy changes.		<p>delivery to accommodate the likely impacts of the issues raised. The GNLP will have a five-year land supply upon adoption and a buffer to meet housing need in the plan period.</p> <p>Additional site allocations are not required to meet this need.</p>

MM7 – Policy 1

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Object	Amend wording of policy 1 to cross reference policy 3 to provide a clear steer of what will be required to deliver the growth strategy, whilst protecting and enhancing the area's natural environmental assets. Policy 1 refers to other relevant Plan	<p>Yes</p> <p>Amend policy 1 to cross reference policy 3</p>	<p>No Change</p> <p>Objection noted, however policy 1 is proposed to be modified to include a cross reference to policy 3,</p>

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			policies in relation to housing, the economy, areas of growth and other strategic infrastructure, so links to policy 3 should be included too.		along with policies 2 and 4. As a result, no change to the proposed modification is required.
Norfolk Wildlife Trust (Dr Sarah Eglington, Planning and Advocacy Advisor) [20730]	20730	Comment	<p>We welcome the inclusion of the new paragraph 187 which recognises that at present, there is no need to pursue the development of a new settlement.</p> <p>On map 7 it states there are 1,919 houses from windfall, whereas table 6 gives a windfall allowance of 830.</p> <p>We ask for clarification on which windfall figure is correct, in order to ensure that there aren't any outstanding errors in the collective/overall (sites & windfall) allocation numbers.</p>	<p>Yes</p> <p>Clarification sought on the reason for the use of different numbers on windfall on map 7 and table 6.</p>	<p>Potential Change</p> <p>Support for the inclusion of para. 187 providing clarity on there not being a current need for new settlements is noted.</p> <p>The numbers in Table 6 and map 7 are both correct. Table 6 is a high-level table, with the policy 1 'housing table' setting out the figures out in more detail.</p> <p>However, the partnership acknowledges that the derivation of the figures is not clearly presented. We therefore propose that the figures on Map 7 should be made clearer</p>

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					<p>by adding additional text to the map to break down the figures in accordance with the detail in policy 1 housing table, as follows:</p> <ul style="list-style-type: none"> • 1,089 homes on small sites of 9 or fewer and windfall 2023/24 to 2027/28 • 830 windfall allowance 2028/29 to 2037/38 <p>Further explanation regarding windfall:</p> <p>There are 1,089 'windfall and small site' homes which contribute to the five-year land supply calculation.</p> <ul style="list-style-type: none"> • In the policy 1 housing table these are listed in the row "<i>Forecast development from small sites of 9 or fewer homes and</i>

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					<p><i>other windfall sites over the period 2023/24 to 2027/28</i></p> <p>This is the sum of separate figures per district which are calculated using the 5yls method (as tested at appeal). The figures are heavily reduced ratios of lump sums, as such it is not possible to disaggregate them by location within the hierarchy, this is why they have their own row here.</p> <ul style="list-style-type: none"> • These numbers are not counted separately in Table 6, but are counted within the figure for <i>“Existing commitment (at April 2022) to be delivered to 2038”</i> (row C).

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					<ul style="list-style-type: none"> • Windfall beyond 2027/28 to the end of the plan period in 2038 does not form part of the 5-year land supply calculation; it is counted as a separate single entity for the whole Greater Norwich plan area. This is covered in Row E in Table 6 and a row in the Policy 1 housing table called "<i>Windfall allowance for the period 2028/29 to 2037/38</i>". This figure is for 830. • 1,089 + 830 = 1,919 • When preparing Map 7, as mentioned, it is not possible to disaggregate the windfall and small sites information per settlement, as such the figure is presented as a lump

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					sum. The figure of 1,919 is correct.
Gail Mayhew [13659]	25531	Comment	<p>1. The plan should cover the whole of Norfolk rather than the GNLP area</p> <p>2. Norfolk CC has the governance arrangements to oversee</p> <ul style="list-style-type: none"> • planning for infrastructure • the natural environment. • strategic level planning. <p>3. A new county plan should engage and research widely + consider comparators</p> <p>4. Intelligent spatial modelling should support option and impact testing.</p>	<p>No</p> <p>No specific changes to the GNLP are suggested. The comments question the approach of planning at the three district rather than the county -wide scale.</p>	<p>No Change</p> <p>The partnership does not consider that there is any need to make any amendments to the main modifications in relation to these comments. Norfolk County Council has been fully engaged in GNLP plan-making as part of the partnership and has played a significant role in joint co-ordination of plan-making across the county through the Norfolk Strategic Planning Framework (NSPF). The comments made are noted and could be relevant to the next round of local plan-making.</p>

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Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	25496	Object	<p>Policy 1 clearly sets out that the housing requirement is 40,550 homes – an average of 2,027.5 dwellings per annum (dpa). Pursuant to NPPF para. 47, this should be the basis of the 5-year housing requirement, and not the ‘residual annual requirement’ as stated in Appendix 4. Moreover, this requirement will change from 1st April 2024, and the current figure will be out-of-date by the time the GNLP is adopted in mid-2024. The baseline 5-year requirement is not 5 x 1,990 homes (9,950 homes), but 5 x 2027.5 homes (10,138 homes, rounded up).</p> <p>The reference to adding of a 10% buffer to account for unforeseen delay or non-delivery is not consistent with NPPF paragraph 74. Instead, a 5% buffer should be added. Pigeon calculate the 5-</p>	<p>Yes</p> <p>The 5-year land supply should be recalculated with the requirement of 2,025 homes per year, and a 5% buffer added. This would give a requirement of 10,138 homes between 1 April 2023 and 31 March 2028.</p> <p>An update to D3.2D should be provided so that it can be evidenced that all sites being counted towards the 5 year land supply are deliverable.</p>	<p>No Change</p> <p>The Partnership disagrees with Pigeon Investment’s interpretation of how the 5-year supply should be calculated and that document D3.2D should be updated. The Partnership presented evidence on the housing trajectory in March 2023 and all the evidence presented then has been incorporated into the Main Modifications consultation process. Therefore, there is no need to introduce new evidence to the examination process.</p>

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			<p>year requirement as 10,645 (10,138 + 5%).</p> <p>No revised detailed housing trajectory has been published alongside the proposed Main Modifications. With no updated detailed trajectory published alongside the Main Modifications it is impossible to tell which sites make up the 'deliverable' 5YHLS supply, thus failing the tests of deliverability as set out in the NPPF glossary. Not having an update to D3.2D is especially important given the Government's suggestion that no annual land supply statements will not be required for the first 5 years from adopting a plan, and Pigeon Investment contend whether all the sites in the forecasted 5-year supply are deliverable.</p>		
Serruys Property Co.	25469	Comment	Settlement boundaries have not been updated through the GNLP	Yes	No Change

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Ltd (Mr Richard Cubitt, LP Contact) [12917]			process, it is considered that Thorpe St Andrew Settlement Boundary should have been updated to include consented site (ref: 20151132 and 20190016). The inclusion of this land outside of the settlement boundary will weaken the interpretation of draft policy 1 as it will not be clear what is built form of a settlement and where the countryside policies should apply.	Update Thorpe St Andrew Settlement Boundary to include Oasis Sport and Leisure Centre consented site.	<p>Comment noted.</p> <p>This is not considered to be a soundness issue.</p> <p>This issue was not discussed through the examination and is flagged to the Inspectors for their further consideration.</p> <p>The issue raised here is not an omission in Thorpe St Andrew, no settlement boundaries have been revised through the GNLP plan making process.</p>
Stantec UK Ltd (Miss Daniella Marrocco, Associate) [20706] (for Berliet)	25477	Comment	It is unclear why the overall housing figures set out in Table 6, Table 7 and Policy 1, both the figures for delivery within the Plan period and the figures for the Greater Norwich Area, have been reduced significantly other than reflecting the amendments to the total forecast supply buffer in	<p>Yes</p> <p>New site allocations should be proposed to account for further housing delivery, where necessary.</p> <p>If the reduction to housing numbers is as a</p>	<p>No Change</p> <p>Comments noted. This issue was discussed through the examination at hearings in March 2022 and March 2023 as well as detailed in Topic Papers D3.2 to D3.2E.</p>

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			<p>Table 6 being reduced from 22% to 11%.</p> <p>Further evidence for this reduction should be provided and new site allocations proposed to account for further housing delivery, where necessary. If the reduction to housing numbers is as a result of nutrient neutrality impacts on development, this should be clearly stated.</p>	<p>result of nutrient neutrality impacts on development, this should be clearly stated.</p>	<p>The Inspectors have proposed modifications to ensure the plan is sound based on the evidence presented, as set out in their letter to the GNLP in August 2023 (11.1). The housing forecast has been informed by evidence provided by site promoters and developers; it has taken a cautious approach to delivery. The GNLP will have a five-year land supply upon adoption and a buffer to meet housing need in the plan period.</p> <p>Additional site allocations are not required to meet need.</p>

Policy 2 - Sustainable communities

Policy	Policy 2 – Sustainable communities
Total Number of Representations	13 representations from 13 respondents
Support/ Object/ Comment Breakdown:	<u>MM8</u> Support: 2 Object: 4 Comment: 7

Summary of main issues raised:

- Omission of bespoke water quality text.
- Additional wording needed regarding protection of green infrastructure.
- Object to deletion of references to mitigation and adaptation for climate change.
- Further measures towards net zero are needed.
- Support for inclusion of reference to non-car modes of transport, low/no car development, street and other tree planting.
- Previous emphasis on historic environment has been lost in the modification to this policy.
- Improved referencing to the Broads Authority is required.

MM8 – Policy 2

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Environment Agency (Eastern Region) (Mr Alasdair Hain-Cole,	13069	Object	Object to the omission of bespoke water quality text in this broad-based policy.	Yes Retain policy text on the protection of water quality.	Potential Change Objection noted. It is not considered necessary to amend the modification in relation to water

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Planning) [13069]					quality as the modified policy includes a requirement to avoid risks of water pollution. However, the partnership would have no objection to the retention of direct wording on the protection of water quality.
Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Comment	<p>We welcome the wording of (3) re green infrastructure. However, neither the policy or supporting text makes any reference to protecting existing green infrastructure. The following wording could be added under (3):</p> <p>"...tree planting, whilst protecting and enhancing existing green infrastructure networks, taking account..."</p> <p>This would make the Plan sound in accordance with paras 20(d) and 175 of the NPPF.</p>	<p>Yes</p> <p>Add wording<i>whilst protecting and enhancing existing green infrastructure networks,</i>" to point 3 of policy 2.</p>	<p>Potential Change</p> <p>Although it is not considered necessary for soundness, the partnership would have no objection addition to the proposed change as it would provide greater clarity on the retention of existing green infrastructure.</p>

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Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Comment	<p>Modified point (5) of the policy, we suggest it could be amended to strengthen the policy regarding landscapes as follows:</p> <p><i>"Create beautiful, well-designed places and buildings which respect and enhance the character of the local area (including landscape, townscape, and the historic environment) and seek to enhance it through appropriate design, having regard to any local design guidance (including design codes).</i></p> <p>This would be in accordance with para 130(c) of the NPPF and make the policy sound.</p>	<p>Yes</p> <p>Add wording (<i>including landscape, townscape, and the historic environment</i>) to point 5 of policy 2.</p>	<p>No Change</p> <p>Comments noted. It is not considered necessary to amend the modification in relation to landscape, townscapes and the historic environment as policy 3 (including the proposed modifications) covers this issue.</p>
Anglian Water Services Ltd (Ms Tessa Saunders, Spatial Planning Advisor) [20121]	20121	Support	<p>Support the separation of flood risk/water management and water efficiency in criteria 8 and 9.</p> <p>Agree that criterion 9 should reference equivalent successor regulations and standards.</p>	<p>No</p> <p>No changes suggested.</p>	<p>No Change</p> <p>Support noted.</p>

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Anglian Water Services Ltd (Ms Tessa Saunders, Spatial Planning Advisor) [20121]	20121	Comment	Note the removal of criterion iv regarding the approach to be taken in terms of early engagement with developers and capacity of the wastewater network. We recognise the reasons for moving this to the supporting text, and request that a cross reference to Policy 4 Strategic Infrastructure is included as an additional modification, given the relevance of this statement to both policies.	Yes There should be a reference to policy 4 in the new para. 200a covering discussions with Anglian Water.	Potential Change Comment noted. The partnership supports the inclusion of a reference to policy 4 in para. 200a. This change will be made as an additional modification.
Norwich Green Party (Ms Denise Carlo) [12781]	12781	Object	Object to the deletion of the policy reference to: <i>""mitigating and adapting to climate change, assisting in meeting national greenhouse gas emissions targets"</i> . Otherwise, there is no mention in GNLP policies of the need to mitigate and adapt to climate change. Although Climate Change and Adaptation is a SA objective, it should be explicitly articulated in the policy text. This is consistent with the NPPF in	Yes Retain policy coverage of climate change and greenhouse gas targets. Re-word para 10 to read: 10. <i>Ensure a low level of energy consumption and a high level of renewable energy generation. To achieve this development proposals should:</i>	Potential Change The partnership does not think it is necessary to retain the policy reference to climate change and assisting in meeting national greenhouse gas emission targets. This is because addressing climate change is a keystone of the plan as a whole, and there is a commitment to assisting

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			<p>achieving sustainable development.</p> <p>Further measures are needed to ensure that all new dwellings are built to net zero standards. The GNLP should aspire to go beyond national standards in order to minimise acknowledged future emissions.</p> <p>Suggested additions:</p> <p>Local design codes will consider built form involving arrangement of blocks, streets, buildings and open spaces but not the design and construction methods of buildings. Architects working on net zero buildings make the case that energy demand can be eliminated through good design by using low emission materials, thermal mass, natural ventilation and taking account of local site and climate conditions. NPPF para 154b) refers to the importance of design in planning</p>	<p><i>i) Take account of landform, layout, building orientation, massing, site and building design and landscaping and the risk of overheating:</i></p> <p><i>ii) Provide for the use of sustainable energy and the generation of renewable energy in new buildings using passive solar in their design, local energy networks and battery storage where appropriate.</i></p> <p>Para 10 should also be re-worded for consistency with the NPPF with regard to renewable energy ie <i>on-shore wind schemes will be positively encouraged."</i></p>	<p>in meeting national greenhouse gas emission targets in the plan's vision and in its monitoring framework. The plan also has a climate change statement which sets out how its policies address climate change. However, the partnership would have no objection to the retention of policy text on mitigating and adapting to climate change and assisting in meeting national greenhouse gas emissions targets to reiterate its importance to the plan as a whole.</p> <p>The partnership does not consider it necessary to amend part 10 of the policy as suggested as the modified policy</p>

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			<p>new development to help reduce greenhouse gases.</p> <p>As well as ensuring a low level of energy consumption, all new homes and buildings should be built with integrated passive solar and batteries to generate and store their own energy.</p>		<p>wording reflects the requirements of the NPPF.</p> <p>No change to the policy re. wind is considered to be necessary as its current wording reflects the recent changes to the NPPF on wind power which require community support for onshore wind schemes.</p>
Mr Bryan Robinson [14521]	14521	Comment	<p>Object to this modification as it deletes the references to mitigating and adapting to climate change and assisting meeting national Greenhouse Gas emissions targets.</p> <p>These should remain as primary definitive policies.</p> <p>Without this guidance, decision makers for individual planning applications will have insufficient</p>	<p>Yes</p> <p>Retain policy coverage of climate change and greenhouse gas targets.</p>	<p>Potential Change</p> <p>The partnership does not think it is necessary to retain the policy reference to climate change and assisting in meeting national greenhouse gas emission targets. This is because addressing climate change is a keystone of the plan as a</p>

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			information to understand the implication let alone be able to determine the extent of mitigation or negation arising out of the cumulative impacts of the Plan as a whole.		whole, and there is a commitment to assisting in meeting national greenhouse gas emission targets in the plan's vision and in its monitoring framework. The plan also has a climate change statement which sets out how its policies address climate change. However, the partnership would have no objection to the retention of policy text on mitigating and adapting to climate change and assisting in meeting national greenhouse gas emissions targets to reiterate its importance to the plan as a whole.
Norfolk Wildlife Trust (Dr Sarah Eglington,	20730	Comment	Point 1: We support the inclusion of reference to non-car modes and the encouragement of walking, cycling and public	Yes Amend the modification to point 4 to state ' <i>In the</i>	Potential Change The partnership does not consider it

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Planning and Advocacy Advisor) [20730]			<p>transport in relation to ensuring access to developments.</p> <p>Point 3: We support the inclusion of street trees and other tree planting.</p> <p>Point 4: We support the inclusion of the following sentence: “In the most accessible locations in Norwich, regard should be given to providing low or car-free housing in accordance with Policy DM32 of the Norwich Development Management Policies Local Plan”, but recommend that in order to ensure delivery of this policy in planning decisions that a more objective goal is set in the policy requirements, such as ‘In the most accessible locations in Norwich, low or car-free housing should be delivered in accordance with Policy DM32 of the Norwich Development Management Policies Local Plan’.</p> <p>Point 7: We support the inclusion</p>	<p><i>most accessible locations in Norwich, low or car-free housing should be delivered in accordance with Policy DM32 of the Norwich Development Management Policies Local Plan’</i></p> <p>Amend point 10 to set binding net zero policies that are more ambitious than the Building Regulations.</p>	<p>necessary to amend the modification in relation to point 4. However, the partnership would have no objection to this amendment being made.</p> <p>It is not considered necessary to set local standards for energy efficiency as new Building Regulations are more demanding than, and supersede, the submitted policy requirement. The likelihood that this change would be made was flagged up throughout plan-making and the issue was discussed during the plan’s hearings. The proposed Future Homes and Future Buildings energy</p>

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			<p>of this new sentence.</p> <p>Point 8: We support this inclusion of this new wording around flood risk and water efficiency.</p> <p>Point 9: We are disappointed that the final sentence “If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich” has been removed and recommend that this be re-inserted.</p> <p>Point 10: We object to the revision of this paragraph. Promoting the use of established assessment frameworks can be a resource-efficient way of delivering better quality and higher standards in new developments. There is an urgent need to build genuinely net-zero buildings as soon as possible. A significant role therefore remains for local planning authorities in setting binding net zero policies</p>		<p>standards will be applied when they are implemented nationally.</p>

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			that are more ambitious than the Building Regulations.		
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	25301	Object	Whilst the revisions to criterion 5 helpfully reflect the increased prominence given to design including design codes, we are disappointed to see that some of the emphasis previously given to the historic environment has been lost. We advise that reference should be retained to the historic environment in this policy as an important aspect of sustainable communities.	Yes Re-instate reference to the historic environment in this policy.	No Change Objection noted Strategic policy requirements relating to heritage and the historic environment have been strengthened in Policy 3 which deals with broader environmental constraints. The partnership considers this to be a robust and sound approach. These matters are omitted from policy 2 which now focuses on requirements for on-site provision. This approach is intended to improve clarity and avoid repetition of requirements between the two policies. Policy 2 clause 5

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
					requires beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having regard to any local guidance (including design codes.)
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	25302	Support	Historic England support the main modification relating to Wind energy schemes which reflects national policy.	No	No Change Support noted
Ms Clare Howe [20709] (Sport England)	25385	Comment	Sport England supports the promotion of sustainable communities. Sport England would encourage development to be designed in line with national design guidance as well as local guidance.	Yes Sport England suggest the following changes in red below: 5. Create beautiful, well-designed places and buildings which respect	Potential Change Comments noted. This is not considered to be a soundness issue; however if the Inspectors are minded to make the small amendments

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			Suggest additional references to be included in the policy.	<p>the character of the local area and seek to enhance it through appropriate design, having regard to any local and national design guidance (including design codes).</p> <p>10. To assist this broad-based approach: Planning applications for major developments will be required to be accompanied by a Sustainability Statement (including Health Impact Assessments as appropriate) showing how development will support the above requirements, with <u>housing will address the above matters that are relevant to the proposal.</u> <u>Housing development taking should take</u> account of the National</p>	suggested by Sport England, the partnership would not object.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				Design Guide (and any subsequent related publications) and optionally making use of tools such as Building for a Healthy Life and Active Design Guidance (or any successor). Other developments will meet the policy requirements as appropriate dependent on site characteristics and proposed uses. Flood risk assessments will be provided separately as required by Government guidance in accordance with the NPPF.	
Stantec UK Ltd (Miss Daniella Marrocco, Associate)	25478	Comment	In accordance with NPPF paragraphs 124 and 125 Policy 2 should include a range of minimum densities outside of the urban area, rather than a blanket 25dph to make the most efficient	Yes Provide a range of densities outside of the urban area, rather than a blanket 25dph.	No Change Comments noted. This issue was discussed through the examination and the Inspectors have proposed modifications

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
[20706] (for Berliet)			use of land in other locations served well by public transport.		to ensure the plan is sound based on the evidence presented. The policy sets minimum density thresholds to encourage efficiency. The starting point is the minimum density, and to go lower would need to be demonstrated as justifiable by the particular circumstances of a development proposal. Therefore, it is considered to be clear that 25dpa is a starting point, not a blanket specification.
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	25510	Object	The changes to Policy 2 remove any direct reference to the Broads Authority, which is contrary to NPPF paragraph 176, and the amended Section 17A of the Norfolk and Suffolk Broads Act 1988.	Yes Include direct reference to the Broads and retain 'local character' as a standalone row in Table 8	No Change It is agreed that the GNLP must give great weight to the importance of the Broads to further the purposes of conserving, promoting,

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>In Table 8, which explains the key issues addressed by Policy 2, 'local character' has been replaced by 'design. The Broads Authority takes the view that 'local character' should be retained, and a new row added for the issue of 'design'.</p>		<p>and protecting the area. However, the Partnership does not consider it necessary to change the proposed main modifications to the plan in relation to this comment.</p> <p>The main modifications move the direct reference to the Broads from policy 2 to policy 3. In our view, the absence of a direct reference to the Broads in policy 2 does not make it contrary to NPPF paragraph 176 or the Broads Act 1988.</p> <p>The main modifications to Policy 2 place its focus on on-site issues and policy 3 now focuses on wider built and natural environment issues. This modification</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
					<p>therefore separates requirements for high quality on-site design and the use of design codes which are retained in policy 2 from the wider issue of respecting landscape character and in particular the landscape setting of the Broads which are now in policy 3. It is important to note NPPF paragraph 16(f) advises that plans should avoid unnecessary duplication.</p>

Policy 3 - Environmental Protection and Enhancement

Policy	Policy 3 - Environmental Protection and Enhancement
Total Number of Representations	11 representations from 9 respondents
Support/ Object/ Comment Breakdown:	<u>MM9</u> Support: 4 Object: 2 Comment: 5

Summary of main issues raised:

- Support for modifications to the Natural Environment section, approach to Nutrient Neutrality mitigation, greater protection for the historic environment and landscapes.
- Suggested rearrangement of wording and additional changes to wording.
- Further revision is needed to the Natural Environment section in order to make it sound.
- GIRAMS and Habitats Regulations Assessment – review mechanisms.

MM9 – Policy 3

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Yare Valley Society (Mr John Elbro, Chair)	14909	Support	Support the modifications in the section under the "Natural Environment" seeing them as providing clarification and reinforcement of requirements to safeguard and enhance green infrastructure.	No No changes requested	No Change Support noted.
Natural England (Ms	13804	Comment	Under the policy heading 'The Built and Historic Environment'	Yes	Potential Change

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Louise Oliver, Planning and Biodiversity Advisor) [13804]			the final bullet point is predominately concerned with landscape character, green spaces and the Broads. It would be more appropriate to relocate this point under the 'The Natural Environment' heading of Policy 3.	Move the final bullet point which is predominately concerned with landscape character to the natural environment section of the policy	The partnership does not consider it necessary to amend the modification. This bullet point was included in the built and historic environment section of the policy because it is arguable that landscape character is, to an extent, man-made. However, the partnership would have no objection to this amendment being made as the view could be taken that landscape character is predominantly the result of natural processes.
Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Comment	In relation to our previous comment regarding the relocation of the final bullet point from under The Built and Historic Environment heading to under The Natural Environment heading please note that the supporting	Yes Move the supporting text on landscape character to the natural environment section.	Potential Change Comment noted. See above – the supporting text will be moved as an additional modification if it is concluded that the

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			text at para 209a would also need to be moved to sit under the same heading.		policy text should be amended.
Anglian Water Services Ltd (Ms Tessa Saunders, Spatial Planning Advisor) [20121]	20121	Support	Support the modifications to the policy in respect of the additional clauses to address nutrient neutrality and protected habitats.	No No change requested.	No Change Support noted.
Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Object	During the EiP the Planning Inspector agreed, verbally, with our view that The Natural Environment part of Policy 3, as worded at the Reg 19 stage, was unsound and required a complete revision. Whilst welcoming the subsequent amendments we maintain our objection and consider that further amendments are necessary to make the Policy fully compliant with the NPPF, and the Plan sound. We attach our comments and proposed	Yes Amend the natural environment element of the policy: 1. Change the first para. from <i>“Development proposals should enhance the natural environment through”</i> to	Potential Change The partnership view is that: 1. The suggested change to the first paragraph is not considered to be necessary as green infrastructure is already covered in the final bullet point of this element of the policy.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			amendments for this part of the Policy.	<p><i>“Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new green infrastructure and habitats, through”</i></p> <p>2. Change the first bullet from <i>“Being designed to respect, retain, and add to enhance, natural assets, taking account of local design and other guidance,</i></p>	<p>2. The suggested change to the first bullet is not considered to be necessary as landscape character is already covered in the final bullet point of the built environment element of this policy. However, as stated in relation to this point above, the partnership would have no objection to the landscape character element of the policy being moved to the natural environment section and, if this is considered preferable, would support the proposed wording.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p><i>such as Landscape Character Assessment;</i> to <i>Being designed to respect, conserve and enhance natural assets, including retaining important views and features, landscape settings, strategic gaps and green spaces taking account of local design and other guidance, such as Landscape Character Assessments, and to the importance of the nationally designated Broads Authority Area and its setting;</i></p> <p>3. Include a new third bullet point:</p>	<p>3. The suggested new third bullet point is not considered to be necessary for soundness as there is a reference to the hierarchy below the bullet points. However, the partnership would have no objection to the proposed addition to the policy.</p> <p>4. The suggested addition to the fourth bullet point is not considered to be necessary for soundness. However, depending on the view taken on point 3 above, the partnership would have no objection to</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p><i>Following a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated;</i></p> <p>4. Amend the fourth bullet pint to add: <i>or where there is reason to suspect one may be present. If present, the proposal must follow the mitigation hierarchy in order to</i></p>	<p>the proposed addition to the policy.</p> <p>5. The suggested addition to the fourth bullet point does not add to the policy and is not considered to be necessary for soundness.</p> <p>6. The partnership's view is that this reference to the hierarchy should be retained. However, the partnership would have no objection to this being replaced by references to the hierarchy in the bullet points.</p> <p>7. The suggested</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p><i>be considered favourably;</i></p> <p>5. Change the initial wording of the fifth bullet point from <i>Provision or enhancement of green infrastructure</i> To <i>Provision of new, or conservation or enhancement of existing, green infrastructure</i></p> <p>6. Remove the sentence below the bullet points: <i>In applying the above, regard will be given to the level of importance of the natural asset.</i></p>	<p>changes on biodiversity net gain do not add to the policy and are not considered to be necessary for soundness.</p> <p>8. Although it is not considered necessary for soundness, the partnership would have no objection to the inclusion of the suggested additional sentence at the end of the paragraph as it reflects NPPF para. 180c. However, the view could be taken that it is unnecessary to repeat national policy.</p> <p>9. The partnership do</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p>7. Amend the biodiversity net gain paragraph as follows:</p> <p><i>In addition, development will deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to and helping to <u>achieve local green infrastructure strategies</u>. It will need to <u>should</u> be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the <u>baseline existing situation</u>.</i></p> <p>8. Add a further sentence to the</p>	<p>not consider it to be necessary for soundness but would have no objection to the inclusion of the suggested additional wording on in combination effects.</p> <p>10. The partnership do not consider the proposed changes to the policy on European habitat sites and SSSIs to be necessary for soundness but would have no objection to the inclusion of the suggested amended wording.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p>biodiversity net gain paragraph:</p> <p><i>Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.</i></p> <p>9. Amend bullet 2 of the visitor pressure section of the policy so that it reads:</p> <p><i>The payment of a contribution towards the cost of mitigation measures at the protected sites <u>required for in combination effects</u> and</i></p>	

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p>10. Amend the first part of the paragraph on European habitat sites so that it reads:</p> <p><i>Any <u>proposal development that adversely affects would be likely to have a significant effect on a European site, or causes significant harm to a Site of Special Scientific Interest, will not normally be granted permission. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will need to be supported by information to inform a</u> be subject to assessment under the</i></p>	

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<i>Habitat Regulations Assessment at <u>project</u> application stage.</i>	
Norfolk Wildlife Trust (Dr Sarah Eglington, Planning and Advocacy Advisor) [20730]	20730	Comment	<p>The Natural Environment - <i>“Development proposals will be required to conserve and (deleted text)] should (added text) enhance the natural environment”</i></p> <p>We recommend that this be changed to <i>‘Development proposals will be required to enhance the natural environment, through the following measures, where applicable’</i> in order to restore the certainty of delivery in the previous wording whilst reflecting the updated focus on nature’s restoration in current national policy.</p> <p>We note that the wording in the paragraph about biodiversity net gain has been amended: <i>“[It will need to deleted text] should (added text) be demonstrated”</i>. We recommend that this be changed back to <i>‘It will need to be demonstrated’</i> in order to</p>	<p>Yes</p> <p>Amend the detailed wording of the policy in relation to natural environment enhancements and biodiversity net gain.</p>	<p>Potential Change</p> <p>The partnership does not consider that it is necessary to make the suggested detailed wording changes for soundness, but has no objection to such changes being made.</p> <p>Support re green infrastructure and nutrient neutrality policy noted.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>restore the certainty of delivery in the previous wording whilst reflecting the updated focus on nature's restoration in current national policy.</p> <p>We welcome the inclusion of the reference to provision or enhancement of green infrastructure.</p> <p>We support the inclusion of the new paragraphs regarding the requirement for a Habitats Regulations Assessment on proposals that may adversely affect European sites and the statement that applications will be refused if it cannot be ascertained that there will be no adverse impact.</p>		
Historic England (Mrs Debbie Mack, Historic Environment Planning	25303	Support	We welcome the proposed changes to this policy which represent greater protection for the historic environment and landscapes.	No	No Change Support noted

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Adviser) [19652]					
Serruys Property Co. Ltd (Mr Richard Cubitt, LP Contact) [12917]	25467	Comment	<p>Draft policy 3 of the GNLP still does not refer specifically to County Wildlife Sites ('CWS') but states that development proposals should enhance the built and historic environment avoiding harm to designated and non-designated heritage assets. This means that a CWS designation does not preclude development, but it will be a high and undefined bar to demonstrate that the benefits of development overrides harm unless policy is clearer.</p> <p>We therefore propose that draft policy 3 is amended to set out a clear benefit a development can provide, such as a 10% biodiversity net gain.</p>	<p>Yes</p> <p>Suggested amendments to Policy 3:</p> <p><i>“Development proposals should enhance the built and historic environment (including valued landscapes, biodiversity including priority habitats, networks and species, ancient trees and woodlands, geodiversity, high quality agricultural land and soils) through:</i></p> <ul style="list-style-type: none"> <i>• being designed to respect and retain, and add to, natural assets; taking account of local design and other guidance, and undertaking landscape, biodiversity or other</i> 	<p>No Change</p> <p>Comments noted.</p> <p>This is not considered to be a soundness issue.</p> <p>The representation refers to CWS/biodiversity in relation to The Built and Historic Environment; biodiversity is dealt with under the heading below in policy 2 'The Natural Environment'.</p> <p>The second bullet point of this section already refers to 'designated and non-designated assets of the natural environment'. The policy also already includes reference to biodiversity net gain.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<p><i>appropriate assessments if significant impacts might arise;</i></p> <ul style="list-style-type: none"> <i>• avoiding harm to designated and non-designated assets of the natural environment unless there are overriding benefits from the development, for example at least a 10% biodiversity net gain, and the harm has been minimised”.</i> 	
Stantec UK Ltd (Miss Daniella Marrocco, Associate) [20706] (for Berliet)	25479	Comment	Support in principle for the removal of mitigation contributions being determined by the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. This is considered to enable flexibility as different mitigation providers and	<p>Yes</p> <p>Provide evidence of what is required for the LPA to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites.</p>	<p>No Change</p> <p>Comments noted.</p> <p>The partnership does not consider it necessary to make the suggested changes for soundness as the policy reflects national requirements.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>packages continue to come forward.</p> <p>Proposed amendments to Policy 3 should confirm what evidence would be required for the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites, and define what is meant by both “site integrity” and “unfavourable condition”.</p> <p>There needs to be an agreed mechanism for regular review of the protected sites to establish what their condition is and whether or not continued mitigation is required and, if so, what and where. The conditions within each catchment and at protected sites will continue to change over time as they respond to proposed mitigation measures, therefore any future mitigation requirements should reflect this. Any proposed</p>	<p>Define: “site integrity” and “unfavourable condition”</p> <p>Agreed mechanism for review of protected sites is required.</p>	

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			mitigation approach needs to take account both of the existing established/lawful use of sites, and of the mix of units proposed on any site.		
Wain Estates (Mr Nicholas Mills, Strategic Planning Manager) [20729]	25487	Support	<p>Support principle of MM9. In light of the letter issued from Natural England to 74 different Local Planning Authorities (including Greater Norwich) on 16th March 2023, we support the following addition to Policy 3 (MM9):</p> <p><i>‘Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar: Residential development that results in an increase in the level of overnight stays; ... must provide evidence to enable the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.’</i></p>	No	No Change Support noted

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			This will ensure development is only allowed in cases where Nutrient Neutrality can be achieved through effective on and/or off-site mitigation measures and reinforces the same requirements through the Habitats Regulations and the appropriate assessment process.		
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	25511	Object	<ol style="list-style-type: none"> Under the Natural Environment section of Policy 3, the reference to "Landscape Character Assessment" should be plural because the Broads Authority's Landscape Character Assessment may also be of relevance. Policy 3 needs to not only mention the Broads under the Built and Historic environment, but also under the Natural Environment section. 	<p>Yes</p> <p>Landscape Character Assessment should be written plural and direct reference should be made to the Broads under the Natural Environment section.</p>	<p>Potential Change</p> <ol style="list-style-type: none"> The Partnership agrees that this main modification should refer to Landscape Character Assessments in the plural as is done elsewhere in Policy 3. This typographical error should be corrected by adding a 's' to the reference in the first bullet of the policy's Natural Environment section. <p>No Change</p> <ol style="list-style-type: none"> The explanatory text to Policy 3 refers to

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
					<p>its internationally designated habitats and its undeveloped setting around Norwich, and it is not necessary for soundness that the Natural Environment section of Policy 3 specifically mentions the Broads. Whilst the biodiversity of the Broads is of great significance, there are other important habitats and species found elsewhere in and around Greater Norwich. It is therefore preferable to refer in general to enhancing and avoiding harm to designated and non-designated assets, rather than specifying places and areas.</p>

Policy 4 – Strategic Infrastructure

Policy	Policy 4 – Strategic Infrastructure
Total Number of Representations	8 representations from 8 respondents
Support/ Object/ Comment Breakdown:	<u>MM10</u> Support: 1 Object: 3 Comment: 4

Summary of main issues raised:

- Should be modified to include strategic approach to the delivery of Green Infrastructure.
- Ambiguous wording and issues relating to inclusion of references to Norwich Western Link (NLW).
- It would be helpful to include this as an additional row to the Health Care Requirements table in Appendix 1.

MM10 – Policy 4

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Alice Lawson [20593] National Highways	25276	Comment	Following a review of the suggested changes, National Highways' considers the proposed Main Modifications are unlikely to have a significant impact on the Strategic Road Network, and consequently we offer no further comment at this stage.	No	No Change Comment noted

Respondent	Rep ID	Support/Object/Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
NPS [14146] on behalf of Norfolk Constabulary [13493]	25381	Support	Norfolk Constabulary support MM10 as a result of the inclusion of the wording 'Police Infrastructure' in Policy 4	No	No Change Support noted
Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Comment	To comply with the NPPF, para 171, we recommend that Policy 4 is modified to include a strategic approach to the delivery of GI, and make the Plan sound. Under the heading Other Strategic Infrastructure, (in Policy 4), we recommend that the wording of the policy needs to be amended as follows (or a similar form of wording used): "Improvements to existing strategic green infrastructure and the creation of new green infrastructure will be delivered in line with policy 3 and other relevant plans and strategies including XXX *." * XX - the most relevant and current ones to be identified by the local authorities.	Yes Add text on <i>"Improvements to existing strategic green infrastructure and the creation of new green infrastructure will be delivered in line with policy 3 and other relevant plans and strategies including XXX *." * XX -</i>	Potential Change The partnership does not consider this change to be necessary. This section of the policy already covers GI. However, the partnership agrees that it would be helpful to add a reference to updated strategies at the end so that the policy could state <i>"In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in maps 8A and B and in updated strategies ."</i>

Respondent	Rep ID	Support/Object/Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Norwich Green Party (Ms Denise Carlo) [12781]	12781	Object	<p>NGP objects to the i) ambiguous wording of MM Policy 4 Strategic Infrastructure and Transport in relation to the NWL and ii) to the retention of a NWL broad corridor shown on the Key Diagram.</p> <p>The NPPF (Sept 2023), S16 states that 'Plan should:</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>Uncertainty over the status of the NWL in the Regulation 19 submission led the Inspectors to seek clarification in the first round of written questions. In their response, the GNDP stated that,</p> <p>"the Western Link Road is not necessary for the delivery of any of the proposed</p>	<p>Yes</p> <p>Delete the reference to the NWL from Policy 4 and delete the NWL corridor from the Key Diagram.</p>	<p>No Change</p> <p>It is not considered necessary to delete the reference to the NWL from policy 4 and delete the NWL corridor from the Key Diagram as:</p> <ul style="list-style-type: none"> • The policy covers strategic infrastructure projects which are being progressed by Norfolk County Council and other partners to promote regional connectivity. • The key diagram indicatively shows the NWL and other significant strategic transport improvements which are planned such as those to be made to the A47. It is considered appropriate to show these significant projects in

Respondent	Rep ID	Support/Object/Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>allocations".</p> <p>This position is underlined by the fact that scheme which would cross the River Wensum SAC on a viaduct was not subject of a Habitats Regulations Assessment, for the reason given in the 'HRA published proposed submission GNLP' (July 2021)</p> <p>"The Norwich Western Link road is a Norfolk County Council project not controlled by or reliant on the GNLP, but GNLP recognises progress of the scheme" (7.2.2)</p> <p>Despite the GNLP's clear statement that the NWL is not part of the GNLP, the GNLP has modified the Plan in a way which increases the ambiguity over the NWL. In the Regulation 19 submission, 'delivery of the Norwich Western Link Road'</p>		<p>order to provide context for the plan.</p> <ul style="list-style-type: none"> • It is correct that none of the site allocations in the GNLP rely on delivery of the NWL. • The main modifications are intended to provide clarity on the relationship between the plan and strategic infrastructure improvements being promoted and delivered by others. • The SA and HRA do not cover the NWL and other strategic improvements on the A47 as they are not being directly promoted through the plan and are being delivered by other organisations. These organisations will be responsible for their

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>was referenced under the Transport for Norwich Strategy (TfN). As a Main Modification, Policy 4, the NWL has been moved from the TfN heading to a new section headed, 'And promoting regional connectivity recognising the work already undertaken on...' and goes onto to list a number of schemes that include. 'The Norwich Western Link being progressed by Norfolk County Council'.</p> <p>The Key Diagram continues to show an indicative NWL corridor as part of the Plan strategy.</p> <p>This is notwithstanding the position that the NWL 'is not controlled by or reliant on the GNLP'.</p> <p>A Habitats Regulations Assessment Addendum on</p>		<p>own environmental assessments.</p> <p>The issue was discussed at the hearings.</p>

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>the Main Modifications to the GNLP assessed the amendments to policy 4 Strategic Infrastructure and judged that:</p> <p>'There is no change to impacts on any European site. Policy 3 provides safeguard for European sites'.</p> <p>The SA of the Main Modifications opines that:</p> <p>'The proposed modification does not substantially change the policy but introduces some amendments to wording regarding Norfolk County Council's role in providing highway upgrades, including the Norwich Western Link.' (5.4.3)</p> <p>In other words, the changed MM wording does not alter the position with regard to the NWL not being a policy of the GNLP.</p>		

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>The question of whether the NWL is part of the adopted Plan or not is critical in determining any planning application as Clause 2 of the NPPF makes clear:</p> <p>"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."</p> <p>Despite the fact that the NWL is not a policy of the Plan, Norfolk County Council is using the emerging Policy 4 to progress a NWL planning application and compulsory purchase orders in a report to Cabinet on 4 December. In the accompanying draft document, 'Combined Statement of Reasons for the CPOs and SROs' under a heading of 'Planning and</p>		

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>Policy Context', the County Council states:</p> <p>3.1.24 There is also specific emerging planning policy support for NWL in Policy 4 ('Strategic Infrastructure') of the emerging GNLP. Emerging draft policy is currently worded, following the release of the Schedule of Main Modifications in October 2023....." to state that:</p> <p>"POLICY 4 STRATEGIC INFRASTRUCTURE Strategic Infrastructure improvements will be undertaken to support timely delivery of the Greater Norwich Local Plan and the wider growth needs of the area. Key elements will be: Transport..... This will be achieved by:..... And promoting regional connectivity recognising the work already underway on....."</p>		

Respondent	Rep ID	Support/Object/Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>The Norwich Western Link being progressed by Norfolk County Council....."</p> <p>Reference to the NWL in Policy 4 is allowing the County Council to claim that a NWL is a policy of the emerging GNLP when clearly this is not the case.</p>		
Mr Bryan Robinson [14521]	14521	Object	Object to this modification as it appears to obfuscate whether the NWL is part of the Plan or not.	<p>Yes</p> <p>Do not make the main modification in relation to the Norwich Western Link. It is assumed from the response on monitoring framework that Mr. Robinson also requests that the reference to the road should be removed from policy 4.</p>	<p>No Change</p> <p>Objection noted but no change is considered to be required. The main modifications are intended to provide clarity on the relationship between the plan and strategic infrastructure improvements to promote regional connectivity which are being promoted and delivered by other organisations.</p>
Norfolk Wildlife Trust (Dr Sarah	20730	Object	We are disappointed to see the inclusion of reference in the GNLP for the proposed	<p>Yes</p> <p>The wording of the regional connectivity</p>	<p>No Change</p> <p>Objection noted, but no change is considered to</p>

Respondent	Rep ID	Support/Object/Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Eglington, Planning and Advocacy Advisor) [20730]			<p>Norwich Western Link (NWL) development by Norfolk County Council as a regional connectivity project. At a previous consultation stage for the GNLP we received confirmation that the NWL is not necessary for the delivery of any of the allocations in the plan and recommend that the policy wording here is revised to make it clear that there is no direct policy support in the GNLP for this controversial proposal, which we understand is due to be submitted as a planning application in 2024.</p> <p>Due to the national importance for bat conservation of the woodlands and surrounding landscape on the proposed NWL route (and compliance with the multiple wildlife laws protecting bat roosts from disturbance, damage and destruction), we do not</p>	<p>section of this policy should be revised to only reference elements which have demonstrated they are necessary for the delivery of the GNLP.</p>	<p>be required. The main modifications are intended to provide clarity on the relationship between the plan and strategic infrastructure improvements to promote regional connectivity which are being promoted and delivered by other organisations. It is considered appropriate to include these significant projects in policy 4 and the key diagram in order to provide context for the plan.</p>

Respondent	Rep ID	Support/Object/Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			consider that it is possible that the NWL can be delivered, and consider that the need and deliverability of the proposal should not be taken for granted and given any policy weight in the GNLP.		
Gail Mayhew [13659]	25531	Comment	Norfolk County Council is well placed to raise publicly sourced funds to partner with the private sector for infrastructure + real estate finance to unlock sustainable growth.	No No change to the main modifications is requested.	No Change The comments are noted.
NHS Norfolk and Waveney Integrated Care System (ICS) (Mr Tom Clare, ICS Estates Planning Liaison and Policy Lead) [20725]	25476	Comment	The ICS Estates Team has been in discussions over the master-planning of the East Norwich Regeneration Area and the potential for a new build health facility and is working with Norwich City Council on a Supplementary Planning Document. For the benefit of making sure the adopted GNLP is fully up to date, it would be helpful to include this as an additional	Yes Inclusion of replacement text for paragraphs 263-266 of the strategy and the addition of a new table in Appendix 1 that lists healthcare requirements	Potential Change The update to Appendix 1 provides useful clarity of the healthcare investment projects planned and adding this latest list of projects to Appendix 1 is flagged to the inspectors for information as the Partnership is minded to make these additional modifications. However,

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>row to the Health Care Requirements table in Appendix 1: Infrastructure Requirements. The ICS Estates Team have also taken the opportunity to update the Healthcare narrative and appendix 1 table further to include projects in the Greater Norwich area, the table has been modified to show the projects required in each settlement area and their current status.</p> <p>The ICS Estates Team provides a revised “Health Care” subsection to the Strategy, proposing reworded text to replace paragraphs 263-266. These new paragraphs describe the purpose of the Integrated Care Systems (ICS), the Planning in Health Protocol</p>		<p>the proposal to rewrite paragraphs 263-266 of the strategy is not supported by the Partnership. The text proposed would represent a change in how CIL is spent which has not been agreed by elected members.</p>

Respondent	Rep ID	Support/Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>between the local authorities and healthcare providers in Norfolk, how healthcare requirements are calculated through the Healthy Urban Development Unit (HUDU) modelling tool, and how the current policy across Greater Norwich that prevents Community Infrastructure Levy (CIL) funds being spent on healthcare needs to change in order to meet growing demand.</p>		

Policy 5 – Homes

Policy	Policy 5 – Homes
Total Number of Representations	3 representations from 3 respondents
Support/ Object/ Comment Breakdown:	<u>MM11</u> Support: 0 Object: 0 Comment: 3

Summary of main issues raised:

- Should be modified to include alternative uses for vacant older people’s accommodation.
- Support for modifications relating to viability and affordable homes.
- Should reintroduce reference to ‘safe’ access to schools and facilities.

MM11 – Policy 5

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Serruys Property Co. Ltd (Mr Richard Cubitt, LP Contact) [12917]	25468	Comment	The draft plan makes a specific allocation for specialised housing for older people and site allocations with an element of specialist housing. This means that the plan should support the redevelopment of vacant or unviable care homes to other uses. We therefore propose	Yes <i>“Development proposals providing specialist housing options for older people’s accommodation and others with support needs, including</i>	No Change Comments noted. This is not considered to be a soundness issue. The partnership does not support the proposed amendments in this representation.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>amendments to draft policy 5, so that where existing older people's accommodation and others with support needs is either unviable, vacant or it does not have good access to local services then redevelopment to residential will be supported.</p>	<p><i>sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use. Should it be demonstrated that existing older people's accommodation and others with support needs is either unviable, vacant or it does not have good access to local services then redevelopment to residential will be</i></p>	

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
				<i>supported in principle.</i>	
Stantec UK Ltd (Miss Daniella Marrocco, Associate) [20706] (for Berliet)	25480	Comment	Our Client supports in principle the removal of “brownfield sites” when referring to applicant’s demonstrating that particular circumstances justify the need for a viability assessment at decision-making stage. It is considered that the assessment of viability should not be restricted solely to brownfield sites, as greenfield sites within Norwich Urban Area and Fringe are still urban in nature, with the same challenges as brownfield sites, and therefore should be afforded the same flexibility in relation to viability. The removal of the requirement to provide 10% of affordable homes as available for affordable home ownership, where it meets	No	No Change Comments/support noted.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			local need, is also supported in principle by our Client. Removing this requirement provides greater flexibility for development to take account of the market and could lead to a greater number and or more varied types of affordable housing provision.		
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	25521	Comment	Being within walking distance or cycling distance is one thing, but what about the route? There needs to be footways for people to use to get to these facilities and the amendment does not say that.	Yes The original text referred to 'safe' access to schools and facilities which is useful and needs to be reintroduced.	No Change The Partnership disagrees that this reference to safe access to services is needed in this section of Policy 5. There are references to safe access to services elsewhere in the strategy, such as under Policy 2, and this proposed change to Policy 5 is not necessary for soundness.

Policy 6 – The Economy

Policy	Policy 6 – The Economy
Total Number of Representations	2 representations from 2 respondents
Support/ Object/ Comment Breakdown:	<u>MM12</u> Support: 0 Object: 0 Comment: 2

Summary of main issues raised:

- Additional wording suggested that new development should not have an unacceptable impact on the environment.

MM12 – Policy 6

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Natural England (Ms Louise Oliver, Planning and Biodiversity Advisor) [13804]	13804	Comment	We welcome the recognition given under (5) of Policy 6 to protect, enhance and expand the Green Infrastructure network.	No No change requested.	No Change Comment noted.
Norfolk Wildlife Trust (Dr Sarah Eglinton, Planning and Advocacy)	20730	Comment	Point 2: We note the new paragraph “ <i>Support for rural enterprises through the conversion of rural buildings, the development and diversification of agricultural</i>	Yes Recommend the addition of wording that any new development should	No Change Comment noted. The partnership does not consider it necessary to amend the modification as

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Advisor) [20730]			<i>and other land based rural businesses and well-designed new build. If new build development is proposed to meet local business and community needs in rural areas the use of previously developed land and sites that are physically well-related to existing settlements should be encouraged where suitable opportunities exist. For sites beyond existing settlements and in locations not well served by public transport then development should be well designed and sensitive to its surroundings, should not have an unacceptable impact on local roads and should exploit any opportunities to make the location more sustainable.”</i>	not have an unacceptable impact on the environment.	environmental impact is addressed in other policies in the plan, in particular policy 3.

Policy 7.1 - The Norwich Urban Area including the fringe parishes

Policy	Policy 7.1 – The Norwich Urban Area including the fringe parishes
Total Number of Representations	8 representations from 7 respondents
Support/ Object/ Comment Breakdown:	<u>MM13</u> Support: 1 Object: 4 Comment: 3

Summary of main issues raised:

- East Norwich:
 - Include reference to Anglian Water’s critical sewerage infrastructure within local issues section relating to East Norwich Strategic Regeneration Area.
 - Reference East Norwich Strategic Regeneration Area’s setting adjacent to the Broads.
 - Reinstate previous inclusion of reference to corridors, enhancing linkages and local energy networks.
 - Concern for impact of density of development on historic environment.
 - Support for simplification of the policy between site allocation and strategy documents.
- Preference for previous wording relating to The Built, Natural and Historic Environment.
- Objection to removal of allocation for a contingency site in the Urban Fringe.

MM13– Policy 7.1

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Anglian Water Services Ltd (Ms Tessa Saunders, Spatial	20121	Object	As Anglian Water has critical operational sewerage assets within the East Norwich Strategic Regeneration Area ENSRA allocation (sewerage pumping stations and rising	Yes Amend the modifications to include critical sewerage	Potential Change Although it is not considered to be necessary for soundness, the partnership has no

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Planning Advisor) [20121]			mains), we would seek an amendment to the modifications to include critical sewerage infrastructure within the local issues section.	infrastructure within the local issues section as follows <i>"Development must also protect and enhance biodiversity and green infrastructure; provide for sustainable energy provision and its management; conserve, and where opportunities arise, enhance the significance of heritage assets; and address local issues including: the active railway, the protected minerals railhead, <u>critical sewerage infrastructure</u>, noise, contamination and flood risk issues."</i>	objection to the inclusion of the proposed amendment to policy 7.1.
Natural England (Ms Louise Oliver, Planning and	13804	Comment	To comply with para 176 of the NPPF, under the East Norwich heading of the policy we recommend inserting "take	Yes Amend the policy to read:	Potential Change

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Biodiversity Advisor) [13804]			<i>account of its setting adjacent to the Broads</i> ".	"Development must also protect and enhance biodiversity and green infrastructure; <i>take account of its setting adjacent to the Broads</i> ; provide for sustainable energy provision and its management;	The partnership does not consider the proposed amendment to the policy to be necessary to make the plan sound but has no objection to its inclusion.
Norfolk Wildlife Trust (Dr Sarah Eglington, Planning and Advocacy Advisor) [20730]	20730	Object	Point 5 The Built, Natural and Historic Environment: The wording of the final bullet point for this section has been weakened by changing the wording 'assist in delivering' to 'have regard to' the River Wensum Strategy. We recommend that the original wording be used. East Norwich: We note that the new text removes mention of corridors and enhancing linkages, as well as removing the mention of local energy networks. We	Yes Amend wording from 'have regard to' to 'assist in delivering' the River Wensum Strategy. Reinsert wording on corridors, enhancing linkages and local energy networks.	No Change This is not considered necessary as: <ul style="list-style-type: none"> modified policy 7.1 requires development to protect and enhance green infrastructure and provide for sustainable energy; Site allocation policy GNLP0360/3053/R10 sets out site wide and site specific requirements including

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			recommend that these be re-inserted.		GI corridors and linkages.
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	25304	Object	Whilst we welcome the reduction in site capacity for East Norwich to 3362 homes (elsewhere 3000 in the housing numbers table) we remain concerned as to whether this can be realistically achieved without harming the historic environment.	Yes Is there a reason for the difference in numbers between the table and the text? Should these be consistent?	No Change There is a reason for the difference in the figure in the policy 7.1 table and the site allocation text. East Norwich Strategic Regeneration Area is allocated for 3,362 homes within the Greater Norwich boundary (additional homes on the Utilities site within the Broads Authority area are not included in this allocation figure). The conclusions of the examination hearings are that 3,000 homes are deliverable in the GNLP area to 2038, the remaining 362 homes in the GNLP area are expected to be delivered beyond 2038.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
					Therefore only 3,000 homes are counted towards the GNLP housing supply.
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	25305	Support	We welcome the simplification of the policy in relation to East Norwich and the move to include the site-specific information in a separate policy and avoid (potentially inconsistent) duplication of policy requirements.	No	No Change Support noted
Serruys Property Co. Ltd (Mr Richard Cubitt, LP Contact) [12917]	25472	Comment	<p>We continue to support the allocation following previous representations we have submitted.</p> <p>We support the policy with regard to proposals coming forward at different time scales. It is noted that target housing numbers has reduced to 3000, however this should not be barrier to deliver more homes within the allocation and each application should be determined on a design</p>	<p>Yes</p> <p>Regarding the CWS at East Norwich: We propose that Policy 7.1 is amended to set out a clear benefit a development can provide, such as 10% biodiversity net gain.</p> <p>It is noted that target housing numbers has reduced to 3000.</p>	<p>No Change</p> <p>Support for allocation noted.</p> <p>Comments noted. This is not considered to be a soundness issue.</p> <p>Regarding the reference to a reduced housing target of 3,000 homes; this is considered to be a misrepresentation – the 3,000 figure is what is forecast to be delivered</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>based approach to ensure the most efficient use of land and ultimately address housing need.</p> <p>Given the complex nature of the East Norwich Strategic Regeneration Area (SRA), and the effects of nutrient neutrality, it is right that there is flexibility on the level of affordable housing requirements in general policy, allowing for the masterplan to address deliverability of the SRA.</p> <p>We continue to support the allocations inclusion of all land within the extant planning permissions 12/00875/O and 2011/0152/O; the extant consent for May Gurney Headquarters site [and] within policy GNLP0360 (Deal Ground, Trowse Pumping Station and May Gurney).</p>		<p>within the GNLP area by 2038, it does not include delivery beyond 2038 or land outside the GNLP area.</p> <p>Affordable housing is dealt with through policy 5, site by site exemptions are not considered to be appropriate in site allocation policies.</p> <p>Regarding the County Wildlife Site, the partnership do not support the proposed amendments put forward in this representation.</p> <p>The proposed wording is considered to be overly prescriptive for the strategic site allocation policy which is best placed for the detailed work in the SPD.</p> <p>Policy 3 sets the requirement for all sites to</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>The regeneration of the area should not overlook the commercial/industrial existing use and opportunities including projects linked to renewable energy. For instance, if the prevailing economic and market conditions at the time do not allow for a viable residential solution, commercial alternatives should be sought, either in part or as a whole.</p> <p>The regeneration area includes a CWS, which does not preclude development, and so a clear and unambiguous policy is required to assess the acceptability of proposals that will affect it.</p>		provide biodiversity net gain so it is not considered necessary to restate this.
Stantec UK Ltd (Miss Daniella Marrocco,	25481	Comment	Support for the increase in numbers in Thorpe St Andrew for existing commitments.	Yes Applications under consideration should	No Change It is not considered appropriate to count figures relating to planning

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Associate) [20706] (for Berliet)			<p>No new allocations proposed in Thorpe St Andrew and forecasts do not account for undetermined planning applications under consideration (Specific reference made to applications in Berliet ownership at Pinebanks, Langley North, Langley South and Griffin Lane).</p> <p>It is considered the sites are sustainable previously developed land and would provide a significant contribution to housing numbers (up to 550 dwellings, 248 units over what it already permitted across the Pinebanks and Griffin Lane sites) within the Norwich Urban Area which should be taken into account.</p>	be taken into account in forecast figures.	applications under consideration. This would constitute pre-determination of such applications.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Wain Estates (Mr Nicholas Mills, Strategic Planning Manager) [20729]	25491	Object	<p>Objection to the deletion of the Costessey Contingency Site.</p> <p>We assume that the Inspectors are in agreement that the principle of the contingency site is consistent with national policy but that the issue, as raised in the Inspectors' letter, is that the trigger mechanism is not deemed to be effective and nor could it be reasonably be made effective by modification.</p> <p>Disagree with this position and refer back to previous submissions regarding how to make the trigger mechanism effective; and therefore object to the deletion on this basis. Deleting this contingency allocation would undermine the previously identified benefits the site presented in terms of securing flexibility</p>	<p>Yes</p> <p>Allocate GNLP0581/2043, or reinstate it as a contingency site</p>	<p>No Change</p> <p>Objection noted.</p> <p>The housing forecast trajectory and deliverability was extensively discussed through the examination. The Inspectors have considered points raised and have proposed modifications to ensure the plan is sound based on the evidence presented.</p> <p>The housing forecast has been informed by evidence provided by site promoters and developers; it has taken a cautious approach to delivery to accommodate the likely impacts of the issues raised. The GNLP will have a five-year land supply upon adoption and a buffer to meet housing need in the plan period.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>and security of housing supply; which for reasons we set out above and in our earlier representations, is at risk for a number of factors including Nutrient Neutrality.</p> <p>In light of potential risks to supply, including the implications of Nutrient Neutrality upon housing delivery at major sites within the GNLP catchment, the requirement for this contingency site is not unreasonable or unjustified.</p> <p>Ongoing delays caused by Nutrient Neutrality, which have been unsuccessful in being addressed through the LURA & not mentioned in the King's Speech or Autumn Statement are likely to be delayed beyond the 18 months delay forecast by GNLP trajectory. Suggest implications may be felt for 4-5 years or more. Given the</p>		<p>Additional site allocations are not required to meet this need.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>uncertainty presented with regard to housing trajectory, it is critical that additional sites for housing are identified. We strongly object to the omission of the Costessey contingency site on the basis that the flexibility it affords is imperative to the effectiveness of the Local Plan.</p> <p>The Sustainability Appraisal of the Main Modifications (October 2023) states that 'new and amended policies would be expected to improve the sustainability performance of the GNLP or would have no significant change with regard to sustainability'. We disagree, not only in relation to the benefits a sustainable site in an accessible location could provide in terms of housing supply in the early years and</p>		

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>throughout the Plan period, but also in relation to the unrealised benefits of the contingency site not coming forward, notably around education.</p> <p>There is a need to increase the supply of Sixth Form places in the Plan period to meet the current and planned need for housing. It is a clear requirement of National policy to deliver adequate education infrastructure (see NPPF 16, 20, 22, 24-27, 31 and 35). Despite this, there is no identified alternative site for a replacement sixth form college other than our site. Without our site, there will be insufficient secondary or sixth form places to meet the identified growth in the Plan and will lead to unsustainable patterns of travel given the lack of sixth form options</p>		

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			locally. This will undermine the Plan and its objective to deliver 'vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure'		

Policy 7.3 – The Key Service Centres

Policy	Policy 7.3 – The Key Service Centres
Total Number of Representations	3 representations from 3 respondents
Support/ Object/ Comment Breakdown:	<u>MM15</u> Support: 0 Object: 3 Comment: 0

Summary of main issues raised:

- Objection to no alternative site being considered in Hingham following GNLP0503 being withdrawn.
- Objection to reference to rural exception sites in policy (specifically focussed around Reepham).

MM15 – Policy 7.3

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Henry Isotta [19286] on behalf of Clayland [20699]	25274	Object	The modification to reduce the New Allocations proposed for Hingham from 100 to 80, following the withdrawal of site (GNLP0503) should be rectified with the addition of a substitute site to make up the shortfall. The reasonable alternative site GNLP0298 has demonstrated throughout this consultation to offer this capability and readiness and	Yes Allocation of site GNLP0298 to make up shortfall of homes in Hingham.	No Change The Inspectors made it clear at the hearing sessions that they would not be discussing objectors' sites. Although site GNLP0503 was withdrawn the Inspectors have given no indication that an alternate site should be allocated in Hingham. The

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			would fulfil this need. Limiting all the housing growth for a town such as Hingham to a single site of 80 could be seen as putting all the eggs in one basket		Partnership would not suggest any change to this approach.
Reepham Town Council (Town Clerk) [12490]	25298	Object	<p>Page 58 of the plan states that additional sites may be provided in Key Service Centres by affordable rural exception sites, which may include an element of market housing... This brings into question the soundness of the plan as it seems to open the door for a range of sites to be developed which are outside agreed settlement boundaries. This is of particular concern to Reepham where, for sound reasons, no new sites have been designated.</p> <p>Under Policy 7.3 the number of homes for which planning permission has been granted</p>	No	<p>No Change</p> <p>The inclusion of text relating to affordable rural exceptions sites reflects planning policy. The Inspectors requested Modifications to include this wording within policies 7.2 and 7.3 to be consistent with existing wording in 7.4 and the Partnership do not suggest any change to this approach.</p> <p>The base date of the Plan is 2018 but the figures in Policy 7.3 have been updated to reflect planning permissions and completions from 2018/19</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>have increased from 155 to 203. It would be useful to make clear where these additional properties are.</p> <p>Overall the Town Council is disappointed that data and information used is based on outdated allocations from 2018 and hasn't taken into account up to date permissions. This is unlikely to be an isolated case and brings the soundness of the GNLP as a whole into question.</p>		to 2021/22 and this approach has been applied across the Plan.
Hugh Ivins [14963]	25373	Object	The principal concern relates to the way it is proposed to facilitate a significant number of committed additional homes within the Plan period through development either within the settlement boundary or as rural exception sites, rather than revisiting and adopting earlier proposed allocations that	No	No Change The inclusion of text relating to affordable rural exceptions sites reflects planning policy. The Inspectors requested Modifications to include this wording within policies 7.2 and 7.3 to be consistent with existing wording in 7.4

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			were supported by Broadland and the Town Council. This policy is not sound or legally compliant in respect of the Reepham proposals.		and the Partnership do not suggest any change to this approach.

Policy 7.4 – Broadland Village Clusters

Policy	Policy 7.4 – Broadland Village Clusters
Total Number of Representations	2 representations from 2 respondents
Support/ Object/ Comment Breakdown:	<u>MM16</u> Support: 0 Object: 2 Comment: 0

Summary of main issues raised:

- Absence of any allocation in Marsham.
- Incorrect site area in employment table for site SL2007/GNLP4061/HNF1.

MM16 – Policy 7.4

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Carter Jonas [12669] on behalf of Noble Foods Ltd [19330]	25285	Object	It is considered that the proposed housing target of zero for Marsham in Main Modification MM16 is not sound on the basis that it is not positively prepared, not justified, and not consistent with national policy	No	No Change The Inspectors have not indicated the need to allocate any addition site in Marsham following the deletion of site GNLP2143. The Partnership do not propose any change to this approach.
Lawson Planning	25475	Object	As discussed in our previous representations,	Yes	Potential Change

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Partnership [20713] on behalf of Horsham Properties Ltd [16997]			our client objects to the inaccurate recording of the new allocation area within the table included as part of Policy 7.4 (MM16), which does not reflect the amendments made to Policy SL2007/GNLP4061/HNF1. Unless the table is amended the Plan cannot be considered to represent an effective strategy for securing sustainable economic growth as the Plan policies would be inconsistent with one another.	Amend figure in employment table within Policy 7.4	The Partnership recognises that the new allocation area at site SL2007/GNLP4061/HNF1 is not accurately reflected in the employment table within Policy 7.4. The Partnership would be happy to update this.

Policy 7.5 – Small scale windfall housing development

Policy	Policy 7.5 – small scale windfall housing development
Total Number of Representations	7 representations from 7 respondents
Support/ Object/ Comment Breakdown:	<u>MM17</u> Support: 1 Object: 5 Comment: 1

Summary of main issues raised:

- Support for revised policy approach.
- Concern that revision to policy is a blanket approach to all rural parishes.
- Objection to the limit of three homes per site – insufficient justification. Unnecessary constraint to small scale development.
- Policy 7.5 is likely to remove the supply of rural exception sites and may lead to high levels of development in some Parishes.

MM17 – Policy 7.5

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Wilson Wraight (Mr Dan Hewett, Head of Planning) [19699]	25273	Support	Housing of the type set out in this policy will provide improved choice and aid delivery. It provides much needed flexibility in the plan to assist with delivering homes in rural areas. At a national policy level, it is confirmed at Paragraph	No	No Change The support is noted.

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>69 (a) of the NPPF which requires plans to identify land to accommodate at least 10% of the housing requirement on sites of no larger than one hectare. New homes delivered through this policy will address this national requirement and therefore Policy 7.5 conforms to national policy.</p> <p>Removal of the caps on development within each parish capable is also supported. Moreover, the amended wording of the Policy contains sufficient design and density-based criteria to ensure that development granted against this policy will result in no significant adverse impact on the landscape and natural environment. The policy as re-worded is now considered to be</p>		

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			effective and justified as required by the regulations.		
Ashby St Mary Parish Council (Mrs Tina Higlett, Clerk) [13290]	25283	Comment	<p>Ashby St Mary Parish Council have the following comments which relate only to Windfall sites:</p> <ol style="list-style-type: none"> 1. Ashby St Mary is a village very rural in character and does not have a true village centre. It is made up of four Hamlets, a) Mill Road and Mill Common, b) Hall Road and Church Road, c) Chapel Lane, Chapel Road and Sandy Lane and d) Low Common. 2. Ashby does not have any amenities, part from the joint use of a Village Hall and St Mary's Church. 3. The only Footway in the village is on Mill Road and this is not continuous. 4. Visibility at the Mill Road/Mill Common is limited and the junction of Ashby 	No	<p>No Change</p> <p>The key point here is that Policy 7.5 along with the other local and national planning policies will be taken as a whole when determining planning applications in rural communities such as Ashby St Mary, and the Partnership considers it the right approach that Policy 7.5 covers the whole rural area of South Norfolk and Broadland. If one or more planning applications are made for small-scale development in Ashby St Mary the types of constraints raised by the Parish Council will be taken into account in determining</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>Road and A146 is already overloaded.</p> <p>5. Most of the public Highways are single track with passing areas that have been created by existing traffic over-running the verges.</p> <p>6. Windfall Sites Policy is being applied to all Parishes without taking into account the character and suitability of the Parish for further development.</p> <p>7. The description of the use of this Policy is vague and raises questions on its use:</p> <p>a) Are the sites a single three dwellings to be approved for the period of the Plan or multiple sites considered as and when a planning application is received b) Are they to be in blocks of three dwellings or individual dwellings.</p> <p>The local Plan prepared by the Parish Council after</p>		<p>the application or applications.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			consultation with its residents, was that any new dwelling should be restricted to the Parish Designated Development Area (Mill Road). Outside the Development Area only the change of use of buildings or extension to existing properties should receive planning approval.		
Mr Kennedy Durrant [20704]	25284	Object	There is a degree of tension set out within the policy which needs to be addressed. In particular, the policy seeks to enable development on sites that are adjacent to settlements yet contradicts itself in the need for such development to not either extend the defined settlement boundary or the built form of the settlement. If a development is sited adjacent to a settlement, then in most	Yes Policy 7.5 should be amended to remove the reference regarding the prevention of incremental sprawl. This would prevent the policy from effectively confining development to within existing settlements and severely constraining the potential for housing	No Change It is the Partnership's view that there is a slight misinterpretation of Policy 7.5 here. As drafted the modified Policy 7.5 allows small-scale developments to be allowed outside settlement limits. It should be remembered that reviewing settlement boundaries, either to reduce them or to expand them, is a matter for a future local plan review;

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>cases this is going to result in the built form of a settlement being extended. The policy inadvertently limits the amount of land that can be practically considered for development.</p> <p>It is therefore recommended that Policy 7.5 is amended further to remove the reference regarding the prevention of incremental sprawl. This would prevent the policy from effectively confining development to within existing settlements and severely constraining the potential for housing delivery in rural areas. The form and character of settlements would still be respected through the retention of the criteria set out within the policy text.</p>	<p>delivery in rural areas.</p>	<p>and, is not done on an ad-hoc basis as and when development schemes are approved through the development management process.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Noble Foods Ltd [19330]	25287	Object	<p>It is considered that the site size limit of up to 3 dwellings is not explained or justified and does not take into account the circumstances that might exist at a particular site or village. There might be some sites that could accommodate more self or custom build housing, where it would be inappropriate to unnecessarily limit the scale of development or sub-divide a larger site to meet the dwelling limit.</p> <p>The demand for self and custom build housing might be stronger in some villages, and it would be inappropriate to limit the scale of a development that could address that demand</p>	<p>Yes</p> <p>It is requested that the 3 dwelling limit is removed. A further modification is requested to the 1st paragraph of Policy 7.5 to strikethrough “small scale” and “of up to 3 dwellings”.</p>	<p>No Change</p> <p>The stated purpose of Policy 7.5 “is to allow for a limited number of additional dwellings in each parish beyond those allocated or allowed for as larger scale windfall sites through other policies in this plan”. Removing the 3 dwelling limit would undermine its purpose. This issue was discussed during the examination.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			on a single site. The 3 dwelling site size threshold would provide limited support for the services and facilities within villages, and would fall below the threshold for affordable housing.		
Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	25382	Object	<p>The proposed modification represents a significant change of direction, with the focus shifted away from opportunities for broadly-based windfall development in sustainable communities, to a policy limited only to self-build and custom housing, and further restricted to just three dwellings.</p> <p>We contend that the proposed modification is unsound and does not reflect the provisions of paragraph 79 of the NPPF.</p>	<p>Yes</p> <p>We strongly recommend that Policy 7.5 revert to its original form, extent, and intention.</p>	<p>No Change</p> <p>The Partnership disagrees with reverting Policy 7.5 to its original wording. The examination process revealed some concerns about the original policy and its compatibility with the NPPF. The revised Policy 7.5 has addressed these issues and the proposed modifications will ensure the policy is sound.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			Such limited opportunities to allow small-scale windfall development is – we believe - the wrong way of providing flexible and sustainable windfall growth opportunities in villages. And would be an unnecessary constraint to potential small-scale development and sustainable growth across a range of settlements through the Plan period.		
Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	25295	Object	<p>Hempnall Parish Council (HPC) says Policy 7.5 should be deleted to make the GNLP sound.</p> <p>1. Policy 7.5 creates an incentive to landowners that will remove the supply of rural exception sites which is the reverse of what is needed.</p> <p>2. Form and character are too loosely defined and will lead to unsuitable</p>	<p>Yes</p> <p>Policy 7.5 should be deleted to make the GNLP sound.</p>	<p>No Change</p> <p>Policy 7.5 was discussed through the examination process and main modifications are proposed to make the policy sound. The Partnership considers that having a policy that provides “a limited number of additional dwellings in each parish beyond those allocated or allowed for as larger scale windfall sites”</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>development being approved.</p> <p>3. Whilst the policy prevents the incremental expansion of settlement boundaries, the outcome will nevertheless be just such extensions because the development permitted under Policy 7.5 will likely be incorporated into settlement boundaries when the GNLP is reviewed in the future.</p> <p>4. The perimeter of some rural settlement stretches for many miles, and several developments could be permitted under Policy 7.5, leading to a scale of development in some settlements that is equal to or greater than the number of homes provided by allocated sites.</p>		<p>is the right approach for meeting the housing needs of the area.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	25379	Object	<p>CPRE Norfolk says Policy 7.5 should be deleted to make the GNLP sound.</p> <ol style="list-style-type: none"> 1. Policy 7.5 creates an incentive to landowners that will remove the supply of rural exception sites which is the reverse of what is needed. 2. Form and character are too loosely defined and will lead to unsuitable development being approved. 3. Whilst the policy prevents the incremental expansion of settlement boundaries, the outcome will nevertheless be just such extensions because the development permitted under Policy 7.5 will likely be incorporated into settlement boundaries when the GNLP is reviewed in the future. 	<p>Yes</p> <p>Policy 7.5 should be deleted to make the GNLP sound.</p>	<p>No Change</p> <p>Policy 7.5 was discussed through the examination process and main modifications are proposed to make the policy sound. The Partnership considers that having a policy that provides “a limited number of additional dwellings in each parish beyond those allocated or allowed for as larger scale windfall sites” is the right approach for meeting the housing needs of the area.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>4. The perimeter of some rural settlement stretches for many miles, and several developments could be permitted under Policy 7.5, leading to a scale of development in some settlements that is equal to or greater than the number of homes provided by allocated sites.</p>		

Policy 7.6 – New Settlements

Policy	Policy 7.6 – New Settlements
Total Number of Representations	3 representations from 3 respondents
Support/ Object/ Comment Breakdown:	MM18 Support: 1 Object: 0 Comment: 2

Summary of main issues raised:

- Support for deletion of this policy, supporting text should also be deleted.

MM18 – Policy 7.6

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Norfolk Wildlife Trust (Dr Sarah Eglinton, Planning and Advocacy Advisor) [20730]	20730	Support	Support the deletion of this policy for new settlements.	No	No Change Support noted
Hempnall Parish Council (Mr I J Nelson,	25296	Comment	Hempnall Parish Council (HPC) welcomes the rewording of Policy 7.6 but says paragraph 187b should be deleted because it could	Yes Paragraph 187b should be deleted.	No Change Paragraph 187b refers to “ <i>detailed exploratory work to consider options</i> ”, which in the Partnership’s opinion

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Clerk) [13769]			still be seen as predetermining the inclusion of a new settlement or settlements when the GNLP is reviewed in the future.		gives clarity that the consideration of new settlements as options does not predetermine the outcomes of the next local plan.
CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	25380	Comment	CPRE Norfolk welcomes the rewording of Policy 7.6 but says paragraph 187b should be deleted because it could still be seen as predetermining the inclusion of a new settlement or settlements when the GNLP is reviewed in the future.	Yes Paragraph 187b should be deleted.	No Change Paragraph 187b refers to “ <i>detailed exploratory work to consider options</i> ”, which in the Partnership’s opinion gives clarity that the consideration of new settlements as options does not predetermine the outcomes of the next local plan.

Appendices

Policy	Appendix 6
Total Number of Representations	2 representations from 2 respondents
Support/ Object/ Comment Breakdown:	<u>MM20</u> Support: 0 Object: 2 Comment: 0

Summary of main issues raised:

- 5 Year Land Supply should be re-calculated.
- Background delivery data should be published.
- Contingency site should be re-introduced.

MM20– Appendix 6

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
Pigeon Investment Management Ltd (Mr Rob Snowling, Associate Director) [13863]	25497	Object	It should be noted that the reference to paragraph 73 of the July 2021 NPPF is now paragraph 74 in the September 2023 NPPF. Policy 1 clearly sets out that the housing requirement is 40,550 homes – an average of 2,027.5 dwellings per	Yes The 5-year land supply should be recalculated with the requirement of 2,025 homes per year, and a 5% buffer added. This would give a requirement of 10,138 homes	No Change The Partnership disagrees with Pigeon Investment’s interpretation of how the 5-year supply should be calculated and that document D3.2D should be updated. The Partnership presented evidence on the housing trajectory in March

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>annum (dpa). Pursuant to NPPF para. 47, this should be the basis of the 5-year housing requirement, and not the 'residual annual requirement' as stated in Appendix 4. Moreover, this requirement will change from 1st April 2024, and the current figure will be out-of-date by the time the GNLP is adopted in mid-2024. The baseline 5-year requirement is not 5 x 1,990 homes (9,950 homes), but 5 x 2027.5 homes (10,138 homes, rounded up).</p> <p>The reference to adding of a 10% buffer to account for unforeseen delay or non-delivery is not consistent with NPPF paragraph 74. Instead, a 5% buffer should be added. Pigeon calculate</p>	<p>between 1 April 2023 and 31 March 2028.</p> <p>An update to D3.2D should be provided so that it can be evidenced that all sites being counted towards the 5 year land supply are deliverable.</p>	<p>2023 and all the evidence presented then has been incorporated into the Main Modifications consultation process. Therefore, there is no need to introduce new evidence to the examination process.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>the 5-year requirement as 10,645 (10,138 + 5%).</p> <p>No revised detailed housing trajectory has been published alongside the proposed Main Modifications. With no updated detailed trajectory published alongside the Main Modifications it is impossible to tell which sites make up the 'deliverable' 5YHLS supply, thus failing the tests of deliverability as set out in the NPPF glossary. Not having an update to D3.2D is especially important given the Government's suggestion that no annual land supply statements will not be required for the first 5 years from adopting a plan, and Pigeon Investment contend whether all the sites</p>		

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			in the forecasted 5-year supply are deliverable.		
Wain Estates (Mr Nicholas Mills, Strategic Planning Manager) [20729]	25490	Object	We do not consider that the MM proposed in respect of housing delivery support the Local Plan as an effective one which will achieve housing numbers required (MM20, MM1 and MM2). In previous evidence produced by the Partnership, the view was taken that 'given progress towards identifying mitigation solutions to address NN...the partnership considers that there would be justification to confirm a housing land supply of circa 6.05 years between 1st April 2023 and 31st March 2028'. Within MM20 (Appendix 4 – Housing Delivery Trajectory and 5-year Land Supply), this five-year housing land supply has been reduced	Yes Allocate GNLP0581/2043, or reinstate it as a contingency site	No Change Objection noted. The housing forecast trajectory and deliverability was extensively discussed through the examination. The Inspectors have considered points raised and have proposed modifications to ensure the plan is sound based on the evidence presented. The housing forecast has been informed by evidence provided by site promoters and developers; it has taken a cautious approach to delivery to accommodate the likely impacts of the issues raised. The GNLP will have a five-year land supply upon adoption and a

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>further. The updated calculation is for a 5.77 year supply, a 'surplus' of 1,687 homes.</p> <p>The previous April 2022 Housing Delivery Trajectory established 'existing permissions and allocations' of 1,987 in 2020/21 and 2,609 in 2021/22. However, the updated Housing Delivery Trajectory shows that 'delivery' of homes at 2020/21 was 1,602 – 385 (19%) less than 'commitments' and at 2021/22 was 1,886 – 723 (28%) less than 'commitments'. The delivery shortfall is likely due to the aforementioned unresolved Nutrient Neutrality matters. Given that the 'total forecast supply' for the remainder of the plan period (to 2038) is based upon information gathered from developers and industry averages for</p>		<p>buffer to meet housing need in the plan period.</p> <p>Additional site allocations are not required to meet this need.</p>

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>lead-in times and sales rates for new homes, the predictions are not an absolute and are highly changeable. Compared with the previous trajectory (April 2022), the updated trajectory sees a significant uplift in figures associated with the 'existing permissions and allocations' supply, particularly up to the year 2031/32. It is a justified concern that this uplift may not materialise. In this case, the contingency site at Costessey (Policy GNLP0581/2043), which is demonstrated to be both available and achievable for delivery of 800 homes with the ability to meet a Nutrient Neutrality solution on site (refer Appendix 1 – MEC Report as submitted alongside our previous 'Matter 4' response), is a justified and effective</p>		

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>addition to the Local Plan to ensure robustness.</p> <p>The updated Trajectory (Appendix 4, MM20) feeds directly into the MM2 at Table 6 which 'establishes the Plan's total housing potential figures'. This modification maintains a Housing requirement (2018 to 2038) of 40,541, however it includes an amended 'Total Forecast Supply' (previously 'potential') of 45,041. This forecast is reduced from the previous forecast of 49,492 which is in part due to the reduced 'buffer' applied (11%). Comparing the requirement against the forecast supply, this leaves a buffer across the plan period of 4,500 homes (225 homes per year split across the 20-year plan period). It is our view that this buffer is not sufficient to</p>		

Respondent	Rep ID	Support/ Object/ Comment	Summary of comments	Any change suggested by respondent?	GNLP Partnership response
			<p>account for impact upon supply caused by Nutrient Neutrality coupled with potential (currently unknown and unpredictable) market and political/policy changes. The importance of including the GNLP0581/2043 as an allocation, able to provide 800 homes, is clear to ensuring robustness and flexibility of the Local Plan to respond to supply and delivery challenges. If not allocated, at the very least, the site should be identified as a contingency site.</p>		