



NORWICH City Council

Committee Name: Council

Committee Date: 20/07/2021

Report Title: Greater Norwich Local Plan (GNLP) – Submission to the Secretary of State for Independent Examination

Portfolio:	Sustainable and inclusive growth
Report from:	Executive director of development and city services
Wards:	All Wards
OPEN PUBLIC ITEM	

Purpose

To agree to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination.

Recommendations:

It is recommended that Council:

- (1) agrees that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination, subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;
- (2) agrees to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

- (3) delegates authority to the Executive Director for development and city services, in consultation with the cabinet portfolio holder for sustainable and inclusive growth to:
 - (a) agree minor modifications to the GNLP prior to its submission.

and,

- (b) negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.

Policy Framework

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets the corporate priorities great neighbourhoods, housing environment, and inclusive economy.

This report addresses the following strategic actions in the Corporate Plan:

- a clean and sustainable city with a good local environment that people value; ensure our services mitigate against any adverse effects of climate change and are efficient to reduce carbon emissions;
- build and maintain a range of affordable and social housing;
- improve the quality and safety of private sector housing;
- continue sensitive regeneration of the city that retains its unique character and meets local needs;
- mobilise activity and investment that promotes a growing, diverse, innovative and resilient economy;
- address barriers to employability and enhance social mobility.

This report helps to update the local plan for Greater Norwich. The Greater Norwich Local Plan (GNLP) once adopted will replace the Joint Core Strategy for Broadland, Norwich and South Norfolk which currently forms a key part of the local plan for Norwich.

This report helps to meet the following objectives of the COVID-19 Recovery Plan:

- Business and local economy,
- Housing, regeneration and development
- Climate change and the green economy

Report Details

Summary

1. On 20 January 2021, Norwich City Council's [Cabinet](#) approved the publication of the pre-submission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
2. The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. With the exception of matters specifically addressed by the recommendations of this report, and that of the report to Cabinet on 7 July, noted below, it is concluded that the representations received have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted.
3. At its meeting on 7 July 2021, [Cabinet](#) agreed to recommend to Council that it agrees that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations. It also agreed to recommend to Council that it agrees to
 - Request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;and,
 - Delegate authority to the executive director for development and city services in consultation with the portfolio holder for sustainable and inclusive growth to:
 - agree minor modifications to the GNLP prior to its submission, and
 - negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.
4. Cabinet also agreed to commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans.
5. On this basis, it is therefore proposed that Council approves submission of the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, subject to the caveats and delegations specified above.

Background

6. Norwich City Council, Broadland District Council, and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP builds on the long-established joint working arrangements for Greater Norwich, which delivered the Joint Core Strategy (JCS). The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038. The GNLP includes strategic planning policies and allocates individual sites for development.
7. When adopted the GNLP will become part of the Development Plan for Greater Norwich, and will replace the current Joint Core Strategy and the Norwich Site Allocations and Site Specific Policies Plan. The Norwich Development Management Policies Plan will not be replaced.
8. A joint team of officers from Broadland, Norwich, South Norfolk and Norfolk County Council has prepared the GNLP. The Greater Norwich Development Partnership Board (GNDP) exercises political leadership for the planning activities carried out jointly by the Greater Norwich Local Planning Authorities. The board is made up of three members each from Norwich City Council, Broadland District Council, and South Norfolk Council and a member from the Broads Authority. The group is supported in its role by Director level representation from each Local Authority.
9. On 20 January 2021 Norwich City Council's Cabinet agreed to publish the pre-submission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
10. The publication of the GNLP allowed stakeholders to make representations in respect of whether the GNLP was: 1) legally and procedurally compliant; 2) Sound¹; and 3) in compliance with the Duty to Cooperate. Regulation 19 representations are sent to the independent inspector to be considered as part of the independent examination.
11. A copy of the report of the GNLP Manager to the GNDP meeting of the 24 June 2021 is included as Appendix A. Its recommendations were agreed at the GNDP meeting on that date. The GNDP report sets out the main issues raised in response to the publication of the GNLP and provides a link to the Statement of Consultation in paragraph 9; this includes summaries of all representations with officer responses, including minor modifications. With the exception of matters set out below, for the reasons specified in the GNDP report it is concluded that representations have identified no significant issues, in principle, that

¹ Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy

cannot be addressed or are such as risk to the GNLP that it should not be submitted.

12. The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.

Current position/findings

13. The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. Included as Appendix A is the report of the GNLP Manager to the GNDP meeting on 24 June 2021. This report sets out the main issues raised in response to the publication of the GNLP. Officer responses to the most significant representations are set out in Table 2 of the report. For the reasons set out within the report, and with the exception of matters set out below, it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
14. The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.
15. When completed the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Norwich Site Allocations Plan. In doing so it will ensure that the Strategic Policies remain up-to-date and that the housing and jobs needs of the area continue to be met to 2038.
16. In respect of managing development through the determination of planning applications, to the extent that the adopted development plan policies are material to an application for planning permission the decision to grant or refuse permission must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
17. Whilst policies of the development plan do not become “out-of-date” simply through the passage of time, it is important that plans are kept up-to-date in order to ensure that the policies that they contain carry full weight in the determination of planning applications.
18. Moreover, in its Planning for the Future document published in March 2020, government also set out its intention to set a deadline of December 2023 for all local authorities to have an up-to-date local plan, indicating that government will prepare to intervene where local authorities fail to do so.

19. It is therefore important that the Council makes timely progress on the production of the GNLP.

Proposed action

20. In accordance with the recommendations, it is proposed that Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, agrees to request that the inspector makes any main modifications necessary to make the plan sound and legally compliant, and delegates authority to the executive director for development and city services in consultation with the portfolio holder for sustainable and inclusive growth to agree minor modifications to the GNLP prior to its submission, and to negotiate any main modifications necessary to make the GNLP sound as part of the independent examination.

Consultation

21. The GNLP has undergone several stages of statutory consultation since its commencement in 2016, and reports have been provided to both Sustainable Development Panel and Cabinet throughout that period. The relevant portfolio holders have been briefed throughout the process, including the council's members who sit on the GNLP, Cllr Waters and Cllr Stonard (and until recently Cllr Maguire). As noted above the most recent period of consultation was the Regulation 19 pre-submission consultation in February – March 2021. The responses to this consultation from the public and stakeholders are set out in within a link in paragraph 9 of Appendix A.
22. In addition, [Sustainable Development Panel](#) met on 22 June to discuss the Submission GNLP. Members' comments included noting the need for clarification on the timescales for further work on the identification of additional Gypsy and Traveller sites, and the need for further clarification on Environment Agency concerns about water resources. The cumulative impact of extensive development around Norwich on protected species was also noted and interest was expressed in the outcome of the discussions currently taking place with Natural England on the mitigation necessary to protect sites protected under the Habitats Regulations.

Implications

Financial and Resources

23. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.
24. The GNLP is produced under an agreed budget with contributions from the three councils. Existing staff resources from each of the three authorities are also utilised to support the production of the plan. There

are no direct financial implications arising directly from this report. The council's contribution towards the cost of producing the plan is expected to be met from existing budgets. Delays in the progress of the plan are likely to result in further costs being borne by each of the three authorities.

Legal

25. The matters of whether the plan is legally and procedurally compliant, and whether the Council's obligations under the Duty to Co-operate is a key test of the independent examination. The publication of the plan allowed for representation to be submitted in regard to the Plan's compliance with these tests. For the reasons set out in section 3, and with the exception of the outstanding matter related to compliance with the Habitat Regulations, it is not considered that any representations made give rise to concern that the plan has not met its legal obligations.
26. If adopted following a successful independent examination, an interested party has 6 weeks to apply for judicial review on the basis that the Plan, or its production, is unlawful. The pre-submission publication of the plan and its subsequent independent examination is proportionate mitigation for this risk.
27. With regards to the management of development, when adopted the GNLP will become part of the Development Plan for the area. In accordance with section 70(2) of the Town and County Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, to the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. Paragraphs 13-15 above set out the implications for decision making of maintaining an up-to-date Development Plan.
28. It should be noted that in agreeing to submit the plan the Council will be increasing the weight that may be attached to the emerging policies as material planning considerations in the determination of planning applications in the area covered by the plan.
29. Legal advice has been sought on various matters relating to plan development during its preparation, which has been reported to the city council's GNLP members as appropriate, and has helped inform the development of the plan.

Statutory Considerations

Consideration:	Details of any implications and proposed measures to address:
Equality and Diversity	The GNLP has been subject to Equalities Impact Assessment. This is available in the link to evidence base documents under the

Consideration:	Details of any implications and proposed measures to address:
	Background Documents section of this report. In summary, although it is considered that (other than the absence of allocated Gypsies & Travellers' sites) the GNLP is considered to have little impact on the equality of protected groups, there may be opportunities to enhance the life opportunities of some protected groups at planning application stage. The GNLP offers a range of ways to address socio-economic inequality.
Health, Social and Economic Impact	<p>The plan supports healthy communities and health and active lifestyles by encourage green infrastructure and improving connectivity. It also encourages new communities to be well integrated with existing communities and to be attractive places to live. The plan also seeks to ensure that there is good access to services including health car and leisure facilities, and also seeks to deliver high quality new homes.</p> <p>In terms of economic impact the GNLP promotes economic development and seeks to generate the right levels of growth in the right places in order to support the local economy, including by stimulating investment, new infrastructure, and environmental improvements. The plan proposes that the city centre will continue to play a significant role as the economic dynamo of Greater Norwich, by supporting provision of retail and leisure facilities and a range of cultural and tourism attactions and new jobs needed to support housing growth across the plan area.</p>
Crime and Disorder	Policy 2 of the GNLP requires development proposals to 'create inclusive, resilient and safe communities'.
Children and Adults Safeguarding	N/a
Environmental Impact	The plan promotes delivery of transport infrastructure to support existing and new communities and supports modal shift and greater connectivity. Its policies protect and enhance the natural and built environment. It aims to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and supports and promotes clean

Consideration:	Details of any implications and proposed measures to address:
	<p>growth and progress towards a post-carbon economy.</p> <p>The impact of the plan's proposals on sustainability and other environmental issues has been assessed through the GNLP Sustainability Appraisal (Incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment evidence documents. These reports are available in the link to evidence base documents in the Background Documents section below. This evidence is considered to be robust as noted in the GNDP report at Appendix A. Discussions on the evidence base and how it has assisted in forming policy will be an important part of the examination.</p>

Risk Management

Risk	Consequence	Controls Required
The GNLP has been prepared under an accelerated timetable. As such it was not possible to carry out the Regulation 18D consultation that was agreed by the GNDP board on 10 th July 2020 and subsequently agreed by councils' through updates to their Local Development Schemes (LDS).	Some representations have raised concerns about the lack of a Reg 19D consultation. A number of mitigation measures have been put in place through the accelerated programme to minimise the additional risk posed by removing this stage of consultation.	<p>Mitigation measures include agreement that a streamlined decision making process would be required involving some delegation of authority, eg for the content of minor modifications for issues such as updates of text of plan for clarity.</p> <p>In relation to the Regulation 18D consultation which did not take place, the GNLP team has had confirmation that this will not affect the soundness of the plan.</p>

Other Options Considered

30. Council may defer the submission of the GNLP to seek further clarifications prior to its submission, seek further amendments to the plan if it

considers the plan is currently unsound or no longer represents an appropriate strategy or it may resolve not to submit the GNLP for independent examination.

31. Any of the above options would cause a delay to the progress of the plan. The length of such a delay would depend on the reasons for the decision taken.
32. Any amendment to the plan that is proposed would need to be agreed independently by each of the three Councils and, depending on their significance and extent, may require further consultation on the plan or for the pre-submission publication be repeated. Such a decision would therefore likely lead to significant delays to the plan.

Reasons for the decision/recommendation

33. For the reasons set out above under section 'Current position/findings' (paragraphs 11 -17), it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted.
34. In addition, the timely progress of the GNLP is important in order to ensure that the Council's Development Plan remains effective and that the policies of the Development Plan continue to have full weight in the determination of planning application.

Tracking Information

Governance Check	Date Considered
Chief Finance Officer (or Deputy)	Hannah Simpson 09/07/21
Monitoring Officer (or Deputy)	Kat Hulatt 09/07/2021
Relevant Executive Director	Graham Nelson 9/07/2021

Background papers:

Greater Norwich Local Plan, including changes required to the Policies map on adoption of the GNLP (shown in the settlement maps in the Sites plan) - [Downloadable Documents and Forms | GNLP](#)

Sustainability Appraisal, Statement of Consultation and other supporting documents - [Evidence Base | GNLP](#)

Please note that the summary of representations made pursuant to regulation 20 i.e. duly made representations made in response to the pre-submission publication of the GNLP, are summarised in the GNLP report included as appendix A of this report.

Copies of all representations made under regulation 20 will be submitted to the Secretary of State.

Appendices:

**Appendix A: Report to Greater Norwich Development Partnership
(GNDP) 24 June 2021**

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Greater Norwich Development Partnership (GNDP)	
Report title	Submission of the Greater Norwich Local Plan (GNLP)
Date	24th June 2021
<u>Recommendation</u>	
<p>The Board recommends member councils to:</p>	
<p>1. Agree that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;</p>	
<p>2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans.</p>	
<p>3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;</p>	
<p>and,</p>	
<p>4. Delegate authority within the councils to:</p>	
<p>a. agree minor modifications to the GNLP prior to its submission</p>	
<p>and,</p>	
<p>b. negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.</p>	

Section 1 - The purpose of the report

1. The Regulation 19 stage of local plan-making, which for the GNLP took place in early 2021, provides the opportunity to make representations on the legal compliance and soundness of a draft plan. This enables:
 - a. Recommendations to be made to members about whether a plan can be submitted, or alternatively further consultation or a repeat of the Regulation 19 stage is required to enable significant changes to be made to the plan;
 - b. After submission, an Inspector to decide on whether the plan can proceed to examination and, if so, what issues that examination should cover.
2. This report sets out the main issues raised through the Regulation 19 stage of plan-making. It concludes that the representations have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future. The recommendation provides the caveat that submission of the plan is subject to progress being made on key issues relating to protected habitats and Gypsy and Traveller sites.
3. The recommendation also covers delegated authority at the three councils, which will need to be co-ordinated, for the sign-off of minor modifications covering issues such as corrections, updated information and clarification of supporting text stemming from representations prior to submission of the plan. Delegated authority is further recommended to negotiate main modifications during the examination, which are likely to be related to policy content. Both of these measures are the standard approach and are required for the examination to run effectively.
4. Subject to approval, the GNLP report will be considered by the councils in July to decide whether to submit the plan for examination on July 30th. If the plan is submitted at that date, examination is timetabled for November/December 2021 (subject to the Inspector) and adoption for September 2022.

Section 2 – Context

Challenges

5. The GNLP has addressed a number of challenges:

The changing context for plan-making - Since work began on the GNLP in 2016, through the three stages of consultation between 2018 and 2020, and most particularly over the last year, there has been a rapidly changing context for plan-making. In August 2020 the “Planning for the Future” white paper was published by government. It points towards a potentially radical overhaul of the planning system as a whole, including plan-making. Significantly for the GNLP, it highlighted the need for local plans to play their part in addressing the housing crisis nationally and locally. In the short term, government reiterated that the current round of plans in development such as the GNLP must be adopted by the end of 2023. In the longer term, it pointed to a quicker, more certain,

digitised planning system, with an enhanced role for local plans as the main means of public engagement on site selection and development.

Housing numbers for plans - Housing need is established locally using a national standard methodology. Changes proposed to the methodology prior to and as part of the government's August 2020 consultation have subsequently been amended and household projections and affordability data which form part of the methodology are regularly updated. Consequently, though housing need figures have changed somewhat and will change further over time, it is necessary to fix on an appropriate number to produce a plan. In addition, the need is a minimum for any plan, with local plan housing provision also having to take account of economic growth potential and of providing a buffer to ensure delivery of the housing required to address the housing crisis. The approach taken at the Regulation 18 stage of plan-making, which included a number of preferred options and alternative approaches for policies and sites, including consulting on the amount of growth and its proposed locations, has provided flexibility to make changes between plan-making stages.

Sustainable growth – the GNLP promotes the right types of growth in the right locations to facilitate post Covid-19 economic recovery, promote the post-carbon economy, address climate change impacts and support services in our communities. This has been done by maximising the potential of brownfield sites, supporting high technology employment growth, particularly in the Cambridge Norwich Tech Corridor, and providing for greenfield sites for housing growth on the edge of the urban area, towns and villages.

Protecting and enhancing habitats - to ensure growth does not have a negative impact on internationally protected habitats, work has been undertaken at the county level on addressing increased visitor pressure on those habitats. The plan also provides for the protection and enhancement of locally significant habitats and will follow on from the success of the JCS in providing improved green infrastructure.

Representations

6. **No representations have been made that in the view of officers would require further Regulation 18 consultation or a repeat of the Regulation 19 stage.** However, some representations have raised issues which must be addressed before submission, and possibly before and at the examination. In particular, work on protecting key habitats will need to be agreed with Natural England, at least in principle, to enable submission. This is set out in section 3 of this report.
7. Section 4 covers issues which are not considered to require further work prior to submission but seem likely to be dealt with at examination.
8. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). Appendix 1 provides information on the numbers of representations made in relation to different policies. Please note that this only gives a broad overview of

where concerns and support lie. This is because, for example, considerable concerns about the choice of a housing site in Hingham has been expressed primarily through a co-ordinated representation submitted by the town council rather than through large numbers of separate representations.

9. Appendix 2 provides a concise summary of the main issues raised. It is broadly organised on a policy and thematic basis, though in some cases organisations are named for clarity. A more detailed summary of representations made by different individuals and organisations, which is part of the Statement of Consultation to accompany submission of the plan, and which includes officer responses to the representations, is available [here](#). The full representations made, without officer responses, are available from the GNLP website [here](#).

Section 3 - Issues being addressed ahead of submission and beyond

10. It is anticipated that a number of issues raised through representations will be addressed, in many cases prior to, but in some cases subsequent to, submission. These are issues on which agreement can be made, or common ground identified with some outstanding elements to be debated at examination.
11. These issues will be addressed through Statements of Common Ground with organisations leading to proposed minor modifications to be submitted with the plan, or simply by the authorities proposing minor modifications to accompany submission without the need for a statement.
12. Main modifications, such as major changes to policies, cannot be made at this stage of plan-making. If the authorities are of the view that such major changes are required, another Regulation 19 stage would have to take place, or even a return to the Regulation 18 consultation stage. However, such modifications can be consulted on at examination and then recommended by the Inspector's report of the examination to enable the plan to be adopted.
13. Table 1 below sets out ongoing and anticipated work of this type. Members will be updated on progress on this work at the GNLP meeting and subsequently at Cabinets and Full Councils:

Table 1

Issue	Ongoing/required work
Duty to Cooperate (D to C)	<p>The D to C covers strategic scale cross-boundary issues between councils, infrastructure providers and organisations such as the Environment Agency, Historic England and Natural England. More local issues have been raised in some of the representations to the GNLP in relation to the D to C, which in most cases relate to concerns over the consultation process, which is different from the D to C.</p> <p>The most common D to C issue nationally which has created problems for local plans is meeting the excess housing needs of some, mainly urban, areas in neighbouring areas.</p> <p>For Greater Norwich, the Norfolk Strategic Planning Framework (NSPF) provides a series of agreements through its regularly updated Statement of Common Ground which addresses strategic D to C cross-boundary issues. However, in some cases a commitment to future joint work on more specific cross-boundary issues needs to be agreed, such as ongoing engagement with Breckland District Council on water, power and economic synergies which is being addressed through a specific Statement of Common Ground.</p> <p>In other cases, clarification on issues raised at Regulation 19 is required. This is the case with Natural England, with whom in principle agreement will be needed on addressing the issue of visitor impact on internationally protected habitats. This requires the signing of a Statement of Common Ground prior to submission of the plan. This follows from the GIRAMS work, undertaken under the NSPF, to identify avoidance and mitigation measures for potential recreational impacts, which is not yet approved. It is critical that this in principle agreement is reached through a Statement to enable the GNLP to be submitted, as compliance with the Habitats Regulations it relates to is a legal requirement. Lack of agreement with Natural England could also be judged to be a D to C failure which would prevent examination of the plan. There is a lot of work to do on this which risks the timing of submission on July 30th. If this is not achievable, submission should be considered for September.</p>
Gypsies and Travellers	<p>No sites have been submitted through the plan-making process to address evidenced need. Failure to provide for the evidenced need through specific sites in addition to the criteria-based policy for assessing applications (in policy 4 on Homes) is potentially a risk to the plan being found sound. Consequently, we are proactively engaging with existing families/site owners to explore the potential for acceptable expansion of existing sites through the development management process and continuing to explore options to find suitable land in public ownership on which to bring forward a site.</p>
Evidence updates	<p>Work is also ongoing to supplement and update the evidence base (partly in response to representations) including:</p> <ul style="list-style-type: none"> a. A request from Historic England for Heritage Assessments for a number of proposed sites (mainly in the city centre) and inclusion of other heritage evidence;

	<ul style="list-style-type: none"> b. More detail on the timing of the delivery of sites in the housing trajectory; c. Supplementary viability information; d. Updated information on housing, including the types of homes required; e. Updating of the Habitat Regulations Assessment (HRA) to explain the situation and further justify its conclusions relating to the GIRAMS and the finalisation of the Water Cycle Study.
Minor modifications	Minor modifications to the text (not the policies themselves) of the plan will be submitted mainly to address representations from Historic England, Natural England, the Environment Agency and Anglian Water. These largely relate to the Vision and Objectives, policies 2 (Sustainable Communities), 3 (Environmental Enhancement) and 4 (Infrastructure), as well as a number of site allocations. Other proposed minor modifications will cover the limited number of errors identified.

Section 4 – Potential issues for the examination

14. The actual issues for the examination will be determined by the Inspector taking account of policy and legal requirements, his or her own judgement and the representations that have been made.
15. In the light of the representations made, national policy/guidance and experience of previous examinations, the three key issues for the plan's examination (if submitted) are most likely to be:
 - a. The overall housing numbers and the locations and deliverability of growth, including site viability and the impact on climate change;
 - b. Addressing Habitats Regulations visitor pressure issues through an agreed approach with Natural England;
 - c. Provision of a site/s to meet the needs of Gypsies and Travellers (though this has not been a focus of representations, expert advice is that this is an issue).
16. Taking account of the broad range of representations made, and subject to progressing the matters set out in the recommendation, officers recommend that the plan as drafted can be submitted. We are confident that well-reasoned arguments can be provided at examination to justify the approach taken in the plan in relation to the issues raised in representations.
17. Table 2 below provides officer summaries of the potential issues for the examination based on the representations that have been made, with officer responses in relation to these issues which will be worked up further as we head towards examination. A number of the representations highlight different interpretations of the National Planning Policy Framework and its supporting guidance.
18. As referenced in paragraph 9 above, Appendix 2 provides further detail of the representations, with full representations available [here](#).

Table 2

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

		<p>consulted on as well as those proposed for allocation, and new sites were submitted.</p> <p>The system of plan preparation would be rendered very inflexible if such changes required a further regulation 18 consultation.</p> <p>The decision to not include revisions to settlement boundaries in the plan resulted from the timetable changes stemming for the release of the “Planning for the Future” white paper. Amendments will be possible through any future review of development management policies.</p>
B. Plan content		
Overall housing growth	<p>Representations from different organisations and individuals state opposite views that the plan provides for:</p> <ul style="list-style-type: none"> • Too little housing growth (it doesn’t reflect economic aspirations and there is questioning of the methodology re. housing numbers); • Too much growth (housing need + a 5% buffer is sufficient, insufficient account has been taken of climate change, with the South Oxfordshire plan referenced as a plan challenged on the scale of growth in relation to climate change). <p>Also -</p> <ol style="list-style-type: none"> a) Windfall – a greater or lesser focus should be placed on windfall in calculating housing numbers, and policy 7.5 is considered unworkable; b) Contingency – more contingency sites are required versus none are needed. 	<p>The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The challenge to the South Oxfordshire plan concerning the scale of growth and its climate change impacts was unsuccessful. Meeting housing need was identified as a key consideration as well as addressing climate change as plans need to provide for economic, social and environmental sustainability.</p> <p>The approach to windfall, which allows for some of the likely delivery to be included as part of overall housing provision, is considered appropriate. As windfall delivery is likely to remain robustly high, it is appropriate to include a limited</p>

		<p>proportion as part of total potential delivery.</p> <p>One contingency site is included should this prove to be required due to low delivery of allocated housing sites.</p> <p>The overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal if this were to occur.</p>
5-year land supply	Representations (from some in the development industry) question the proposed approach to the 5-year land supply which is based on the housing need identified through the standard methodology without including the buffer.	The figure of 49,492 is potential housing delivery during the plan period, not the housing need. The need is 40,541, calculated using the standard methodology. The latter is proposed to be used to calculate 5-year housing land supply.
The location of growth	<p>1) Settlement hierarchy</p> <p>i) Suggested changes (all to include more growth in specific locations):</p> <p>(1) Wymondham should be a Large Main Town;</p> <p>(2) Mulbarton, Scole and Horsford should be Key Service Centres (KSCs);</p> <p>(3) A separate countryside category is needed.</p> <p>ii) The amount of growth in different parts of the hierarchy:</p> <p>(1) More vs. less in the urban area (sustainability + availability of sites from city centre decline vs. deliverability and market saturation issues), over reliance on Strategic Regeneration Areas with limited evidence (East Norwich and Northern City Centre) and the North East Growth Triangle.</p>	<p>1) The Settlement Hierarchy, which is based on evidence of the services available in different settlements, is considered to be appropriate. Open countryside is in the village clusters level of the hierarchy</p> <p>The overall growth strategy, including housing and jobs numbers and locations, is considered to be well-evidenced and to meet the plan's objectives. This will be achieved by focussing the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and addressing climate change impacts. At the same time, the strategy allows for some growth in and around smaller villages to support local services. Our strategy maximises the potential of brownfield land and accessible greenfield sites. The strategy also offers a range of types and locations of sites which will help to ensure that the broad range of housing needs of our communities are met, enhancing delivery of the housing by providing opportunities for a range of house providers.</p>

	<p>(2) More/less growth in towns (less in Aylsham, more in Wymondham and Diss, new sites needed in Long Stratton).</p> <p>(3) More/less growth in KSCs – different views with focus on more in Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham vs. less in Reepham and a different site in Hingham;</p> <p>(4) More/less growth in village clusters.</p> <p>2) The lack of a Green Belt has been criticised;</p> <p>3) New Settlements – there has been questioning of the lack of inclusion of new settlements, whilst an alternative view stated is that policy 7.6 should not prejudice the next plan;</p> <p>4) The Cambridge Norwich Tech Corridor (CNTC) should be a greater focus for growth;</p> <p>5) Undeliverable sites with no promoter or developer should not be in the plan.</p>	<p>2) Regulation 18 included consultation on the potential for a Green Belt. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. Establishing a Green Belt for the future at this stage will reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.</p> <p>3) The GNLP does not allocate any of the proposed new settlements as there are considered to be enough sites to meet needs in and around existing settlements. The strategy takes account of the Government's proposed changes to the planning system, with policy 7.6 setting out the intention to bring forward a new settlement or settlements through the next strategy and sets out a timetable for that work.</p> <p>4) Forming part of the defined Strategic Growth Area, the CNTC is a major growth focus. Due to high levels of existing commitment in locations such as Wymondham, Hethersett, Cringleford and Easton which are already strategic locations for growth, only limited additional housing numbers have been added in these locations in this plan.</p> <p>5) Further evidence will be submitted showing that undeliverable sites have not been allocated in the plan.</p>
Sites subject to significant/most representations	<p>1) East Norwich (the main concerns are over capacity and deliverability, including from Historic England);</p> <p>2) Anglia Square (the policy should be amended to reflect recent changed intentions concerning the site);</p> <p>3) The UEA Grounds Depot (the allocation should be deleted as the Yare Valley is a priority Green Infrastructure corridor);</p>	<p>Concerns over specific sites and locations for growth will be a key part of the examination and it will be for the Inspector to decide whether modifications are required to the policies we submit. As set out above, officers are confident that the site selection and plan-making process raised in relation to some locations has been sound.</p>

	<p>4) Aylsham (the main concerns are over the process of adding a further site at the Regulation 19 stage and over infrastructure capacity);</p> <p>5) Hingham (the main concern is over site selection);</p> <p>6) The Showground (the main concern is over transport capacity);</p> <p>7) Lingwood (the main concern is over the site selection process adding a new site at the Regulation 19 stage);</p> <p>8) Foulsham (the main concern is over an historic hedgerow);</p> <p>9) Colney (the main concern is over the non-selection of a site).</p>	
Transport	The Norwich Western Link (NWL) should not be in plan, there is insufficient focus on walking, cycling and other sustainable transport and too much focus on aviation.	Although it is not a specific plan proposal, the inclusion of the NWL road reflects its progress by Norfolk County Council as an infrastructure priority, with a Preferred Route announcement made in July 2019. This applies to other improvements to transport including to the airport, rail services, trunk and primary roads and measures to promote active and sustainable transport which are also included in the GNLP.
Climate change	There is insufficient coverage of climate change issues which should be the basis of the plan. This includes the amount, distribution and timing of growth, inadequate targets and monitoring, an inadequate approach to energy and water efficiency and flood risk.	<p>The climate change statement in the GNLP strategy sets out and justifies the broad ranging approach the plan takes to tackling climate change.</p> <p>As set out above, the strategy focusses the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and helping to address climate change impacts. It also allows for some growth in and around smaller villages to support local services, the loss of which would generate the need for more journeys.</p> <p>The overall housing numbers in the plan are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19</p>

		<p>recovery and the move to a post-carbon economy.</p> <p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that national targets regularly change so it is appropriate that GN should contribute to those national targets. Thus, targets will be updated locally when they change nationally, as with changes made by the government this year.</p> <p>The GNLP contains policies which cover all relevant aspects of the emerging NSPF proposals for how local plans in the county should address climate change. Minor modifications to the GNLP's Delivery and Climate Change Statement and relevant text supporting policies will be submitted to provide updates on how this emerging policy advice (in agreement 19 of draft NSPF) is addressed. This is mainly achieved through the design of development required by Sustainable Communities Policy 2. The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.</p>
Infrastructure	Provision is insufficient to support growth (especially for health and schools).	Appendix 1 setting out the infrastructure required to serve growth is based on evidence collected in the GNLP Infrastructure Needs Report. This has been produced by working with the relevant infrastructure providers, including Norfolk County Council for schools and health care providers for health facilities, so are the best available information which provides a planned approach to meeting growth needs. Updates will be made on an ongoing basis if and when circumstances change.
Housing	1) Affordable housing (AH) – the policy would over-deliver against need, there should be no AH requirement on student developments;	1) The homes policy is well evidenced. The affordable housing targets are based on evidence of need and have taken account of viability. Affordable housing is required on student accommodation

	<p>2) The Accessible homes and space standard requirements are not evidenced;</p> <p>3) Elderly needs should be covered by more allocations, not just general policy support;</p> <p>4) Self /Custom build shouldn't be a fixed percentage.</p>	<p>away from UEA. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address affordable housing needs.</p> <p>2) The standards set for accessible and adaptable homes are also based on evidence of need and have taken account of viability</p> <p>3) Allocations have been made for and including housing for older people and policy 5 allows for such accommodation to be provided on any housing site.</p> <p>4) Promotion of self/custom build is a government priority. The requirement for at least 5% of plots on sites of 40 dwellings plus will support their delivery. It will not be applied if lack of need can be evidenced.</p>
Evidence	<p>Questioning of:</p> <ul style="list-style-type: none"> a) The validity of the Viability study; b) The Habitat Regulations Assessment (HRA) (and Water Cycle Study); c) The Statement of Consultation and lack of compliance with the South Norfolk Statement of Community Involvement; d) Sustainability Appraisal (SA) <ul style="list-style-type: none"> I. Non assessment of reasonable and strategic alternatives; II. Flawed assessment of specific sites; III. Supports a different strategy (there should only be limited new development in the KSCs and villages); IV. Inclusion of a contingency site is not justified; V. Carried forward sites have not been treated comparably with others; <p>5) Inadequate on carbon assessment and addressing climate change.</p>	<p>All evidence, including the Viability Study, HRA and SA has been produced by appropriate and experienced professional consultancies using the approaches required by government. As such, the evidence is considered to be robust. Discussions on the evidence base and how it has assisted in forming policy will be an important part of the examination.</p> <p>The process of plan-making, which has included three stages of Regulation 18 consultation, is considered to have complied with requirements.</p>

The Examination

19. The Inspector may, having considered differing views at examination, recommend that main modifications are required for the plan to be found sound. The authorities would have to consult on these and bring them back to the Inspector. If this does prove to be the case, members can only adopt the plan with these main modifications included. Main modifications could relate to any substantive aspect of the plan.
20. If the Inspector takes the view that there is a more serious cause for concern in relation to a major aspect of the strategy, such as the amount or the broad distribution of growth, he or she may write to the planning authorities before the hearings asking why the particular approach was adopted. Then, following initial hearings, if the Inspector concludes that an aspect of strategy is unsound, he or she may adjourn the hearings and issue an Interim Report, setting out what is considered necessary to overcome the concerns. During the adjournment, quick decision making would be required from the authorities to decide how best to proceed and bring proposals back to the Inspector.

Section 5 – Conclusion

21. To reiterate, the representations have identified no significant issues that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future.
22. However, the timing of the submission of the plan will be key. This is particularly the case in relation to agreeing the principles of how the Habitats Regulations will be addressed with Natural England. Without this there are significant questions over the legal compliance of the plan and so its submission should be delayed. If the issues set out in the recommendation can be overcome in a short period of time, officers recommend that the plan should be submitted on July 30th. If not, delays until at least September this year will result. If submission were to be delayed to September, the plan should still be able to be adopted within the government's deadline of the end of 2023. The GNLP and then Cabinets and Full Councils will be informed of progress on these key issues to assist their consideration of submission of the plan.

Appendix 1

Representation numbers

This appendix gives a broad overview of those parts of the plan on which the most representations were made. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). As set out in paragraph 8 of the report, this is only an indication of how wide concerns or support is on issues as co-ordinated representations have been made by some groups and organisations.

Strategy

Section/policy with the most representations:

1. Policy 1 – The Sustainable Growth Strategy (86 reps)
2. Section 2 – Greater Norwich Profile (79 reps)
3. Section 3 – The Vision and Objectives (65 reps)
4. Policy 5 – Homes (57 reps)
5. Policy 3 – Environmental Protection and Enhancement (48 reps)

Section/policy with the most support comments:

1. Section 2 – Greater Norwich Profile (25 supports)
2. Policy 7.1 – The Norwich Urban Area (14 supports)
3. Section 3 – The Vision and Objectives (12 supports)
4. Policy 2 – Sustainable Communities (12 supports)
5. Policy 3 – Environmental Protection and Enhancement (10 supports)

Section/policy with the most object comments:

1. Policy 1 – The Sustainable Growth Strategy (78 objects)
2. Section 2 – Greater Norwich Profile (54 objects)
3. Section 3 – The Vision and Objectives (53 objects)
4. Policy 5 – Homes (51 objects)
5. Policy 3 – Environmental Protection and Enhancement (38 objects)

Sites

Sites with the most representations

1. General Aylsham text and settlement map (68 reps)
2. Policy 0596R – Aylsham (55 reps)
3. General Foulsham text and settlement map (30 reps)
4. East Norwich Strategic Allocation (21 reps)
5. Policy 0605 – Foulsham (18 reps)

Sites with the most support comments:

1. East Norwich Strategic Allocation (5 supports)
2. General Taverham text and settlement map (5 supports)
3. General Poringland text and settlement map (5 supports)
4. Policy 0401 – Norwich (4 supports)
5. Policy CC4 a and b – Norwich (4 supports)

Sites with the most object comments:

1. General Aylsham text and settlement map (67 objects)
2. Policy 0596R – Aylsham (54 objects)
3. General Foulsham text and settlement map (30 objects)
4. Policy 0605 – Foulsham (17 objects)
5. East Norwich Strategic Allocation (16 objects)

Appendix 2

Summary of Main Issues raised

1. The Strategy

Foreword and Introduction

Topic	Main Issues raised
Engagement with Breckland	Breckland DC wants to engage on proposals for new settlements and the South Norfolk villages, particularly to understand how development will impact on power and water infrastructure and to investigate the potential for economic synergies in the Cambridge Norwich Tech Corridor (CNTC). A range of comments covering these issues have been made in relation to a number of elements of the text and policies of the plan. Officers from the GNLP team and Breckland are working together to address consequent concerns raised over the D to C through a Statement of Common Ground (SoCG) on further future co-operative work.
The amount of housing growth	The housing number is unnecessarily high. There is no need to increase the number of houses to be built way beyond the number required by the standard methodology.
Location of growth	<ol style="list-style-type: none">1. Questioning of the North Rackheath allocation concerning the continued interest of developers; and, the viability of providing policy compliant levels of affordable housing2. The Cambridge Norwich Tech Corridor links universities in Cambridge and Norwich with research institutes and science parks, so it is questioned how the large number of homes planned for the North East Growth Triangle links to the employment in the Tech Corridor.3. Concentrating large developments on the edge of Norwich counteracts endeavours to secure an appropriate level of housing in rural villages.4. Mixed messages have been given over Wymondham - removing the 1,000-home contingency is unjustified. Furthermore, that the GNLP over relies on windfall sites, and that the South Norfolk Village Clusters Housing Site Allocations Local Plan cannot be relied upon. <p>A lack of consideration has been given to proposals in North Norfolk. Recent announcements regarding a development of 300+ houses at nearby Badgersfield will have an impact on Aylsham, as the majority of children from Badgersfield attend Aylsham High School.</p>
Process	<ol style="list-style-type: none">1. Historic England has concerns about development management policies not being reviewed concurrently with the GNLP, and particularly the lack of a strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.2. The GNLP should have regard to the East Marine Plans, paying attention to the policies and guidance published by the Marine Management Organisation, as well as fulfil Duty to Cooperate obligations.3. Criticism of the approach taken to Aylsham, especially the lack of public consultation amidst the pandemic about the addition of a second site and increasing the total housing requirement to 550 homes.

	<ol style="list-style-type: none"> 4. Not holding the Reg. 18D consultation means there has been no opportunity to comment on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18C consultation, nor to comment on any amendments to policies made since publication of the Reg. 18C consultation documentation. 5. To address climate change, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum. Legal challenges such as that being pursued in South Oxfordshire make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes. 6. The GNLP and the South Norfolk Village Clusters Housing Allocations (SNVHCA) should follow the same, or at least a very similar, timetable. 7. The Reg. 19 GNLP Climate Change Statement states that 'growth in villages is located where there is good access to services to support their retention'. It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP. 8. The decision not to pursue a Green Belt was taken without a full assessment of the evidence, raising questions about both the legal compliance and soundness of the Plan. To address this, CPRE Norfolk suggests a Green Belt on the 'green wedges' model. This evidence is presented in a paper by CPRE Norfolk: 'A Green Belt for Norwich?' 9. There should be closer collaboration in respect of Wroxham/Hoveton. More mention should be made of the numerous neighbourhood plans undertaken at great cost and by a lot of hard work by volunteers. There should also be some acknowledgement of the joint strategic collaboration between Broadland and South Norfolk councils and their joint management teams.
Sustainability + Environmental Impact	<ol style="list-style-type: none"> 1. Clarity is needed on the overall sustainability and environmental impact of the plan in its entirety, including the cumulative sustainability appraisal testing of other plans accompanying the Reg. 19 GNLP. The suggestion is a matrix/progress table for existing policies and allocations – from other existing and proposed DPDs and AAPs, as well as other commitments not already included in policy; 2. The GNLP should list the environmental assets of the area against the System of Environmental-Economic Accounting (SEEA).
GNLP legibility	Acknowledgement is sought that the lessons from the Joint Core Strategy concerning plan legibility have been learnt.
Future proofing	<ol style="list-style-type: none"> 1. There is a need for further analysis about how the Covid-19 pandemic has and is changing peoples' behaviours, and how the GNLP should be future-proofed against these changes. There should a statement in the introduction on how the plan is going to be continually reviewed, and reference made to the Tomorrow's Norfolk, Today's Challenge strategy. 2. The "Planning for the Future" White Paper will quickly supersede the GNLP - it would be helpful to see each council's representations to the Government's proposed changes to the planning system.

Norwich Western Link (NWL)	The NWL, and for some other large-scale road building promoted in the plan, is incompatible with the climate change statement and various other plan statements, ignores the fact that road construction induces demand and is environmentally destructive.
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Greater Norwich Profile

Topic	Main Issues raised
Norwich Western Link (NWL)	As above.
Other transport issues	<ul style="list-style-type: none"> • The GNLP should not commit to expanding the highly polluting and unsustainable aviation industry in policy 4; • Sustainable transport should be part of decision making, be included in the plan and form part of the assessment for development sites; • Respondents dispute the claim that the cycle network is good; • Compulsory installation of electric vehicle charging points is required in houses; • There should be a greater focus on hydrogen-based energy and transport solutions; • Tension exists between carbon emissions being above the national average in rural parts of the area (partly due to a greater reliance on car journeys), the target to reduce carbon emissions, the lack of frequent low-carbon public transport, and the excessive numbers of housing planned.
Housing numbers and Green Belt	<ul style="list-style-type: none"> • CPRE Norfolk view that: <ul style="list-style-type: none"> ○ non-inclusion of a Green Belt (suggested on the 'green wedges' model) is unsound. ○ housing numbers are too high and should be based on the standard methodology + a 5% buffer (this view is shared by individuals, who also state that Brexit and Covid-19 will reduce housing need). • Population projections may change and economic forecasts are too optimistic. By putting forward a higher number of homes to be built, the increase in supply will increase the demand. • Objection to traditional planning approach analysing past trends, projecting them into the future and converting the figures into land requirements. • The 2018 household projections do not actually go far enough. There is no 'slack' in the plan for unexpected growth, or growth in the most sustainable locations.
Location of growth	The proportion of greenfield development (78%) is too high especially as office/ retail space in the city centre will be available for redevelopment.
Engagement with Breckland DC	As above.
Infrastructure Needs	The plan needs to refer to the Health and Wellbeing section to the Norfolk Joint Strategic Needs Assessment (JSNA) which is the standard tool when predicting future health needs and trends in order to inform on housing and other factors.

Views from groups and about specific locations	
Norwich Green Party	<p>The Norwich Area Transportation Strategy has been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike, but is a very long way from delivering an upgraded bus infrastructure plan (in the JCS). Suggest that:</p> <ul style="list-style-type: none"> • text and policies should place a greater focus on sustainable transport; • county council seeking much larger road schemes than is necessary for addressing localised problems or for serving new development. <p>The following changes are needed /considerations should be taken account of:</p> <ul style="list-style-type: none"> • An overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008 is needed, supported by a strategy and policies in line with the carbon budget trajectory. The Tyndall Centre shows Norwich must cut its carbon emissions by 13% every year to meet its contribution to Net Zero, Broadland and South Norfolk must make cuts of 13% and 14.25% respectively. Carbon emission contribution to sea level rise is a concern. • A lower housing number (42,568 dwellings plus a 5% buffer) is needed resulting in lower development pressures on greenfield sites; • Growth should be concentrated in high density low car developments close to sustainable transport hubs, with a higher concentration around Norwich; • No dispersal of development to small villages which lack services; • No new garden city settlements in open countryside distant from railheads; • Protection of Green Wedges around Norwich; • Development should be built to zero carbon standards that include renewable heating based on renewable energy generation; • Retrofitting of historic development needed; • A transport strategy is needed based on traffic reduction and a high degree of modal shift to bus, walking and cycling; • Norwich Western Link should be abandoned and there should be no further major increases in road capacity; • High nitrogen dioxide levels should be addressed, notably at Castle Meadow.
Natural England	<p>The natural environment section is incomplete, with more focus needed on biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed plan may impact on and address these issues. The plan also needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but also locally protected sites.</p>
RSPB	<p>The plan needs to cover other land use categories where soil is an important resource e.g. peat soils provide for carbon capture + habitats.</p>
The Environment Agency	<p>There is no information about the Water Framework Directive (WFD) and risk to water quality. No links are made to risk from development, or that preventing deterioration is a requirement.</p>
Stop Norwich Urbanisation (SNUB)	<ul style="list-style-type: none"> • Questions how London in 90 and plan for a rail halt at Rackheath are addressed; • The expense of exemplar eco-homes in Rackheath questions how planners can insist on deliverable carbon neutral housing; • More references to sustainable drainage systems are needed.

Location specific representations	<ul style="list-style-type: none"> • The plan should acknowledge that development at Rackheath will affect the village of Salhouse due to shared facilities; • Coltishall PC has concerns about the village suffering further from traffic growth due the NWL road and dispersed housing development; • A development promoter supports the Strategic Housing Market Assessment. requirement of 3,900 additional communal establishment places for over 75s. A non-allocated care village at Barnham Broom has potential to help to meet the need; • Concern from Bunwell PC about how large-scale developments, such as at Long Stratton, affects villages e.g. high school capacity; • Concerns over primary and secondary school capacity and funding due to the delay in the Rackheath North development; • Aylsham needs a new primary school now and cannot wait until new development is partially or fully completed; • Colney Hall should be removed from the plan as it is outside settlement boundaries; • BAW 2, Bawburgh and Colney Lakes is allocated for a water-based country park but the 2009 Colney Parish Plan suggested a much less intrusive approach. The BAW 2 land should be part of a Norwich Greenbelt involving the Yare Valley.
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Vision and Objectives (V + O)

Topic	Main Issues raised
Support	
Community Facilities and Green Infrastructure	<ol style="list-style-type: none"> 1. Sport England support the development of sustainable communities with good access to green infrastructure, sports facilities, and better opportunities to enjoy healthy and active lifestyles. 2. Rackheath PC state that any new community facilities should be offered within the remit of the Parish Council. 3. Norfolk Biodiversity Partnership support access to greenspace as a key part of what makes a community healthy and attractive.
Water Quality	The Environment Agency supports the V + O but would like to see additional wording on water quality.
Objections	
Scale of growth	The scale of growth is incompatible with achieving the V + O.
Location of Growth	<p>Reps. from the development industry:</p> <ul style="list-style-type: none"> • A new settlement or garden village would better achieve net zero carbon emission development better than 'edge of settlement piecemeal growth'. • The Vision should be strengthened on the importance of the economy in the countryside. <p>Other reps. have stated that windfall conceals the scale of development proposed in villages in South Norfolk.</p>

Growth in Main Towns and KSCs (particularly Aylsham)	<p>Concern expressed by individuals and the Town Council that additional growth in Aylsham included in the Regulation 19 draft plan:</p> <ul style="list-style-type: none"> ○ Is not compatible with the objectives that <i>people should have access to facilities and protecting and enhancing the distinctive characteristics of towns</i>; ○ Will make the scale of growth in Aylsham so great (at 15%) that it will not be possible to integrate existing and new communities; ○ Has not been consulted on and/or gone through the full democratic/plan-making process; ○ Will not be supported by adequate infrastructure, with concern over the need for timely provision of a primary school and transport issues; ○ Extra housing would have to meet carbon neutral standards to ensure greater efficiency in water and energy usage to achieve the V + O. <p>Concern also expressed over the scale of growth in main towns and KSCs overall, in particular in Reepham.</p>
Norwich Western Link (NWL)	<p>Reps. on the NWL from the “Stop the Western Link” campaign (SWL), which comprises ecologists, scientists, lawyers, academics and environmentalists:</p> <ul style="list-style-type: none"> ○ argue that the NWL should be suspended; ○ strongly object to the inclusion of the NWL within the GNLP, stating the plan purports to exclude the NWL when it is manifestly obvious the intention is to include it. SWL finds this pretence to be wholly objectionable. <p>A number of individuals and the CPRE are also oppose the NWL on environmental grounds (destruction of valuable habitats and damage to chalk streams), stating it is in conflict with the green agenda that is expressed later in the strategy, including reducing private car journeys and emissions.</p>
Historic/Natural Environment and Landscapes	<ol style="list-style-type: none"> 1. Representations from Historic England and Natural England propose changes to text on the environment. Historic England have also requested protecting landscapes to be in the V + O. 2. RSPB request clarification on how and by whom the environment will be maintained and enhanced, pointing to the role of landowners.
Quality and density of homes	<p>CPRE contends that it is impossible to ensure that homes will be built at appropriate densities in relation to local character given the independence of the plan for the South Norfolk villages, including concerns over the “minimum” 1,200 figure in the South Norfolk clusters as this has not been consulted on and figures could be much higher.</p>
Carbon monitoring and targets	<p>The Centre for Sustainable Energy recommends taking an approach similar to Manchester based on analysis carried out by the Tyndall Centre which considers baseline emissions and sets a carbon budget. It also suggests that the economy objective should be more explicit about carbon emission reductions and that the infrastructure objective is strengthened to reflect the scale of infrastructure provision required to deliver zero carbon. Other representations have pointed to:</p> <ul style="list-style-type: none"> • the need for a comprehensive baseline, targets and monitoring of the plan based on reductions from 1990 carbon emission figures; • the need to reduce transport emissions in rural areas which should be key to the growth strategy by reducing growth in rural areas.

Working with Breckland	Breckland DC comments as above.
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Delivery and Climate Change Statements

Topic	Main Issues raised
Delivery Statement	
Legal process	Reps. from members of the public in relation to Reepham and Aylsham questioned the legality of the plan-making process in relation to consultation (particularly in relation to additional housing numbers and sites at the Regulation 19 stage), including failure to engage with those parish/town councils through the Duty to Cooperate or to take note of local views expressed through consultations.
Working with the private sector	The GNLP committing to working with the private sector to overcome constraints to planning is an insult to all who live and work in communities, including all town and parish councils.
Location of growth	<ol style="list-style-type: none"> 1. Development should be concentrated within the Norwich urban area; 2. The plan should allow for more employment development within the countryside where a rural location can be justified.
Infrastructure	Reference should be made to Norfolk Constabulary's potential infrastructure needs.
Climate Change Statement	
	The Environment Agency supports the climate change statement.
Growth in Aylsham	Additional growth in Aylsham with two sites on the edge of the settlement is not compatible with reducing carbon emissions.
Norwich Western Link road (NWL)	The NWL is incompatible with the climate change statement by leading to increased usage of the private car and increase carbon emissions, as well as damaging the Wensum Valley.
The scale of growth and its environmental impact	<p>Unacceptable climate change and environmental impact of the amount of overall growth with concerns over:</p> <ul style="list-style-type: none"> • resource use, including insufficient standards for energy efficiency (Norfolk Wildlife Trust stated this is the case compared to other authorities) and water efficiency; • the level of population growth, inward migration and continued development, which could better be met elsewhere in the country, being inappropriate for Greater Norwich; • biodiversity (including the need to further promote net gain and green infrastructure in rural and urban areas), reducing overheating, ecosystem protection and the loss of greenfield land; • limited local service provision in new developments; • over reliance on the car and lack of provision for infrastructure for electric cars; • improvements required to rural public transport.
The location of growth	<ol style="list-style-type: none"> 1. The location of growth should address climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in rural locations; 2. The amount of growth in KSCs and the Main Towns is too high.

	The statement and the strategy should be flexible over certain developments which require rural locations and can incorporate sustainability in their design.
Carbon monitoring and targets	<ol style="list-style-type: none"> 1. There's a lack of an effective baseline and carbon reduction targets required for the GNLP to demonstrate how it will meet its legal obligations, with carbon reduction required at the core of all policies; 2. The GNLP approach to carbon reduction is not urgent enough.
Historic environment	Historic England point to the need to reference climate change and the historic environment.

Policy 1 The Growth Strategy

Whilst a number of representations, mainly from the development industry, support policy 1's overall growth strategy, the great majority of representations as set out in the table were objections:

Topic	Main Issues raised
Main issues raised of direct relevance to policy 1	
Procedural Issues	Duty to Cooperate (D to C) <ol style="list-style-type: none"> 1. The GNLP departs from some of the agreements (nos. in brackets) in the NSPF so the D to C has not been met, including: <ol style="list-style-type: none"> a. The planned job growth is not matched by the housing requirement (3); b. The economic needs forecasts use Experian rather EEFM as per the NSPF; c. The housing requirement is not high enough to address the City Deal (13); d. There are insufficient homes for the elderly and students (14). 2. Breckland DC are concerned (particularly over transport issues and energy and water supplies) that there has been insufficient cooperation over the growth in the Strategic Growth Area and South Norfolk villages. 3. A number of respondents (town/parish councils and individuals) have stated that failure to consult sufficiently is a failure on the D to C.
	Consultation <ul style="list-style-type: none"> • The change in housing numbers between Regs. 18 and 19 and the inclusion of an additional site in Aylsham requires additional Reg.18 consultation; • Policies have not followed from the majority consultee response at Reg 18A (on windfall).
	Dependent Plans <ul style="list-style-type: none"> • Can't rely on Diss and South Norfolk Village Clusters sites which will not be tested through the GNLP; • To address the policy vacuum, DM policies for residential applications in the South Norfolk Village Clusters needed.
	New settlements references and policy should be deleted or amended to identify that <i>opportunities will be explored</i> (alongside other options for growth), rather than prejudging a future plan.

Evidence	<ol style="list-style-type: none"> 1. A new Housing/Economic Needs Assessment should be completed before submission. 2. There is no evidence from SoCGs on the anticipated levels of delivery and/or viability of the current or uplifted site allocations. Concerns: <ul style="list-style-type: none"> • that the levels of housing proposed will not be delivered on sites already allocated for over five years; • over a lack of evidence on the uplift in the density on some existing allocations being achievable. 3. Up-to-date evidence base on open space and play is required.
The amount of growth	<p>Climate Change and Growth</p> <ol style="list-style-type: none"> 1. The plan prioritises economic growth and development over legal requirements on climate change, leading to carbon leakage. 2. A large buffer makes it almost certain that climate change targets will not be met. South Oxon's Local Plan makes it clear that plans can be challenged on climate change grounds. 3. Housing numbers should not be above housing need to minimise: <ul style="list-style-type: none"> • embedded carbon emissions in construction; • emissions from energy and transport emissions. 4. The plan has deferred including climate change policies that will deliver the lowest carbon homes despite the recent NSPF (Ag. 19). <p>Overly dispersed growth is not the best strategy re. climate change.</p> <p>Housing need is higher than in the plan because:</p> <ul style="list-style-type: none"> • The standard method has been miscalculated and is a starting point, with the government's aim to significantly increase housing supply; • Full account isn't taken of the needs of students and older people; • There's a shortfall of 3,704 homes from the City Deal; • The SHMA provides support for a higher local housing need, including affordable housing, than the standard method. <p>Clarity on the methodology used to calculate housing need, along with details of the timing of delivery of allocated sites in the trajectory, should be provided on submission.</p> <p>The housing requirement</p> <ol style="list-style-type: none"> 1. The GNLP is ambiguous and there is no housing requirement set out in strategic policies. A number of reps. (from the development industry) criticise the requirement/target for being too low: <ul style="list-style-type: none"> • Based on the higher housing need and the existing JCS trajectory overestimates, the housing requirement should be 53,207 homes, which includes a buffer of around 24% (18,847 homes 2020-26 and 29,120 from 2026-38); • A higher requirement will aid post Covid-19 recovery; • Others state the buffer should be around 20% but should not include any windfall.

	<p>2. A number of reps. (CPRE, green groups, individuals) state the requirement is too high, most stating that it should be 42,568 (the housing need of 40,541+ 5% buffer), to</p> <ul style="list-style-type: none"> • reduce environmental harm and climate change impacts; • reflect recent demographic changes; • protect the countryside and retain the character of Norfolk; • reflect issues over water supply and quality; • focus growth elsewhere in country where there are more regeneration needs and brownfield opportunities and better infrastructure, reducing the need for internal migration; • prioritise delivery of existing JCS allocations; • allow for flexibility in a time of uncertainty - the housing figures need to be reviewed against Covid-19 and Brexit impacts. <p>3. Many added there should be more use of windfalls in the numbers.</p> <p>4. The Government's continuance of the existing methodology confirms the housing need as 40,541 so there is no need to add 5,000 homes (no need to take account of 2018 projections or the direction of travel in Planning for the Future).</p> <p>5. CPRE and others variously argue that:</p> <ul style="list-style-type: none"> • housing need can be met through completions (2018 – 20), windfall and brownfield sites, so new greenfield allocations and policy 7.5 are not needed; • there should be phasing of delivery for any homes above housing need included following revisions to the standard methodology; • newly allocated sites should be phased to deliver after commitment; • there is no need for a contingency site. <p>5-year land supply</p> <p>1. The 5-year land supply should not be assessed against housing need, but rather against the total housing figure in the plan.</p> <p>2. The high housing targets in the JCS have led to developers winning appeals on unallocated greenfield sites on 5-year supply grounds so should not be repeated.</p> <p>Employment land</p> <p>1. Over-delivery of employment land as per allocations will lead to either a higher housing requirement or more in-commuting. If monitoring indicates either, review of the GNLP will be needed.</p> <p>2. Reassessment of undeveloped allocated employment sites should lead to undeliverable sites being replaced by alternative allocations, including rural brownfield sites.</p>
<p>Location of growth</p>	<p>Settlement Hierarchy</p> <p>1. Clarity is needed on the purpose of the hierarchy and how it has been used to inform the distribution of growth.</p> <p>2. Various respondents have stated that the hierarchy should be changed as, due to their level of services/existing populations:</p>

	<ul style="list-style-type: none"> • Wymondham should have its own separate classification as a “Large main town” (with more growth); • Mulbarton, Scole and Horsford should be Key Service Centres (KSCs) (with more growth). • Village clusters are based on a questionable approach using school catchments (and numbers should be reduced as the strategy has too great an element of dispersal); • The countryside should be identified in the settlement hierarchy enabling the growth of the rural economy. <p>Other comments</p> <p>Various other reps. (mainly from the development industry) have stated:</p> <ol style="list-style-type: none"> 1. In line with the existing strategic approach in the JCS, more growth should be focussed in and around the urban area; 2. Disproportionate levels of delivery proposed in the Norwich urban area will be challenging to deliver and allocations should be distributed more evenly across the hierarchy to ensure diversity, choice, competition and delivery; 3. More growth should be in Main Towns (Wymondham, Aylsham and Long Stratton are specifically identified) and KSCs to support rural economies and ensure delivery. These are even more integral to sustainability due to the current pandemic (home-working, reliance on local services, access to open space); 4. Housing numbers in village clusters should be reduced; 5. New settlements are needed in this plan to create sustainable, beautiful places with clean growth, including promoting strategic growth area/tech corridor. <p>Undeliverable existing/additional allocated homes, particularly on strategic sites, should be redistributed to the most sustainable and deliverable locations (e.g. Wymondham).</p> <p>Reps. from CPRE, parish and town councils, individuals and environmental/political groups, stated:</p> <ul style="list-style-type: none"> • More homes should be concentrated in Norwich using brownfield sites and by converting redundant retail and office space; • The village cluster housing numbers are too high due to lack of service provision and increased traffic generation leading to increased carbon emissions, with electric cars doing little to limit impacts. No further allocations beyond those from the JCS should be made in villages, with windfall policy 7.5 removed in favour of prioritising rural exemption sites for affordable housing; • A Green Belt on the Green Wedges model should be included to protect against urban sprawl; • ONS (2018) project that 95% of household increase in the plan period will be 1 or 2 person households so suburban housing estates are the wrong solution. <p>Aylsham - Reps. from the town council and others state that housing numbers in the town should be reduced with the removal of the site added between Regs. 18 and 19.</p>
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	Breckland DC have concerns over the focus of growth in the A11 Corridor, fearing implications for water and energy supplies and transport in the growth corridor in their district, the cumulative growth including both South Norfolk village cluster allocations and potential new settlements.
Green Infrastructure	Natural England state that the policy needs to be strengthened with regard to the delivery of green infrastructure with cross references to policy 3.
Non policy 1 issues raised A number of significant issues were raised under policy 1 which are of greater relevance to other plan policies plan	
Infrastructure	<ul style="list-style-type: none"> • The Norwich Western Link (NWL) A number of reps. stated that the NWL should not be promoted through the GNLP or transport plans, with the main focus of opposition on impact on the Wensum SAC and increased emissions. • A140 Omission of the upgrading of the A140 between Norwich and Ipswich and concentrating employment in the A11 corridor will not take advantage of growth generated by Freeport East at Felixstowe. • Infrastructure needs are referenced but not quantified, with no indications of where or how they will be provided.
Sustainability Appraisal	No evidence in the Reg. 19 SA that land allocation has been selected based on the least environmental value or of a hierarchy of sustainability compliance.
Sites	A number of proposed allocated and non-allocated sites were supported as they could implement policy 1.
Energy efficiency	Lobby central government to insist on carbon zero building standards. For much of the plan period, the highest standards will not be required. Whole Life Cycle assessments for housing construction (as per London) and elimination of fossil fuel heating are required to reduce emissions.

Policy 2 Sustainable Communities

Topic	Main Issues raised
Water Efficiency	<ol style="list-style-type: none"> 1. No justification for applying an unknown potential future government requirement; should be dealt with through a future local plan review 2. Will policies on water efficiency be sufficient to cope with the cumulative growth of both the GNLP and Breckland?
Climate Change/Energy	<ol style="list-style-type: none"> 1. No coherent climate adaptation policy; policy on climate change, energy etc is inadequate; does not reflect Government carbon emission targets; 2. Electric vehicles will put further pressure on the already constrained energy network; 3. Requirements for energy charging points cannot be in SPD; 4. Requirements for energy charging points have not been taken into account in viability; 5. Requirement for a 20% (or 19%) reduction against Part L of the 2013 Building Regulations is not supported by the evidence; 6. The Greater Norwich Energy Infrastructure Study did not consider neighbouring Breckland district's power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham.
Landscape	Reference to strategic gap policies should be deleted.

Policy 3 Environmental Protection and Enhancement

Topic	Main Issues raised
Main issues raised of direct relevance	
The Built and Historic Environment	<ol style="list-style-type: none"> 1. Include more about the distinctive, unique heritage of the area to make the policy more locally specific; 2. Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments; 3. Need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.
The Natural Environment	<ol style="list-style-type: none"> 1. Natural England state that there are insufficient measures to ensure that adverse effects on European Sites from visitor pressure would be avoided (as GIRAMS is not adopted). Therefore, the plan is not in compliance with the Habitats Regulations; 2. Biodiversity net gain not included in viability – not demonstrated that allocations are deliverable; 3. To deliver biodiversity net gain off-site there must be a mechanism for developers to pay into a central pot that will be used to deliver biodiversity; 4. The need for GI to be met by development is not adequately defined; 5. The policy and supporting text are inadequate to protect, maintain, restore and enhance the natural environmental assets of the area; 6. Need to explain the hierarchies of site protection and mitigation.

Policy 4 Strategic Infrastructure

Topic	Main Issues raised
Transport	<ol style="list-style-type: none"> 1. Too much emphasis on traditional modes of transport and associated schemes, not enough detail on promoting walking, cycling and other forms of sustainable transport; 2. The policy does not go far enough in terms of reducing carbon emissions and tackling climate change; 3. Opposition to the possible construction of Norwich Western Link on the grounds of environmental damage; 4. Concerns that the lack of an up to date transport planning/evidence base (e.g. LTP4 is still in draft stage) means there is disconnect between sustainable transport and spatial growth planning.
Other Strategic Infrastructure	<ol style="list-style-type: none"> 1. Anglian Water has asked for minor modifications over some terminology; 2. No coverage of waste-water infrastructure, the Water Cycle study and the Water Framework Directive; 3. Norfolk Constabulary should be included within the strategic infrastructure element of policy 4, like health Infrastructure. There should also be a specific reference to a (forthcoming) Police Infrastructure Delivery Paper; 4. There is no detail on the delivery of strategic Green Infrastructure (GI); 5. There is no mechanism to secure education infrastructure.

General	<ol style="list-style-type: none"> 1. Agents have promoted specific sites that they believe to be suitable to support the vision and ambition set out in Policy 4; 2. Breckland District Council has concerns that the cumulative impact of growth identified in the plan could cause further strain on local power and water resources, waste management and transport infrastructure.
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Policy 5 Homes

Topic	Main Issues raised
Affordable Housing	<ol style="list-style-type: none"> 1. The 28% and 33% affordable housing policy, if achieved, would over-deliver against the identified need; 2. The reference to 'at least' 33% is ambiguous.
Viability Testing	Greenfield sites can face high development costs so viability testing should be allowed for at the planning application stage (as is allowed for brownfield sites).
Space Standards	There appears to be no robust evidence that would suggest that development below space standards is a concern in the GNLP area. The policy should provide flexibility to recognise need and viability, where necessary.
Accessible Housing	It will either be necessary to demonstrate a need for accessible housing or delete this part of the policy.
Specialist Housing	The need for 3,857 specialist retirement units in the plan area is based on evidence which is not currently publicly available. Even with the allocations proposed, there remains a significant unmet need for retirement homes and/or beds in residential institutions. Specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations (see Inspector's report on the Vale of Aylesbury Local Plan Policy H6).
Purpose built Student Accommodation (PBSA)	PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64(b) of the NPPF states that PBSA is exempt.
Self/Custom-Build	<ol style="list-style-type: none"> 1. The Councils need to consider the robustness of their self-build register as an evidence base and indicator for demand for self-build plots; 2. The Self/Custom-build has not been tested in viability appraisal work; 3. Objections to fixed percentage for serviced self-build plots on larger housing sites (best in windfall policy 7.5).

Policy 6 The Economy (including Retail)

General points	Main Issues raised
	<ol style="list-style-type: none">1. Most responses relate to the promotion of particular sites;2. There is a need for greater flexibility for the reuse/redevelopment of existing businesses;3. There is a need to allocate more land, including a large site, smaller sites and land for other types of employment generating uses;4. There is a need to ensure housing supports sustainable economic growth including town centres, the Cambridge Norwich Tech Corridor (CNTC) and the City Deal;5. The plan fails to capitalise on the opportunity to further support and direct employment growth to the CNTC;6. There are insufficient opportunities for economic development in rural areas;7. There is a need to allocate land to meet the needs of one particular business;8. There are concerns about the cumulative scale of growth, particularly in the CNTC, on Breckland;9. The policy does not provide the mechanisms to deliver jobs that fall outside the old B-class uses – the representation has been made in support of unallocated housing sites that include schools and care facilities.

Policy 7 Strategy for the Areas of Growth

Introduction

Topic	Main Issues raised
Process Issues	<ol style="list-style-type: none">1. Flawed site assessment process (many reps. suggest flaws with the assessment process or HELAA or SA);2. Lack of consultation about increase in numbers at Aylsham;3. Objection to separate South Norfolk Village Clusters Plan.

Policy 7.1 The Norwich Urban Area including the fringe parishes

Topic	Main Issues raised
General	<ol style="list-style-type: none">1. Historic England state that the GNLP should include a policy for taller buildings and the skyline (a recommended scope of a study is provided in the rep.);2. Amend so that all the figures for the allocations are identified as minimums;3. Smaller employment sites should be allocated in key locations to address the impact of housing growth;4. Breckland DC has expressed concerns over the impact of cumulative growth.

The City Centre	<p>Northern City Centre</p> <ol style="list-style-type: none"> 1. The agent for the developer of Anglia Square suggests a number of amendments to align policy GNLP0506 with emerging proposals. 2. Clarification is needed that the objective to preserve office accommodation, potentially via an Article 4 Direction, would not apply to Anglia Square, where redevelopment of redundant offices for homes is welcomed. 3. Historic England continues to have significant concerns regarding the approach to development at Anglia Square, including the lack of an HIA; 4. The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay re. the Anglia Square allocation. <p>Other elements of city centre policy</p> <ol style="list-style-type: none"> 1. Include protection of valued cultural facilities (para. 92 NPPF); 2. Policy 7.1 is restrictive and not in accordance with NPPF and the revised Use Class Order. Greater flexibility is essential to enable vibrancy and viability. In store retail is declining exacerbated by the pandemic; leisure uses should not be restricted to a defined leisure area. 3. Both support for and objection to the deletion of the bullet point regarding landmark buildings at gateways to the city centre.
East Norwich	<ol style="list-style-type: none"> 1. Historic England have concerns: <ul style="list-style-type: none"> • regarding the impact on Carrow Abbey /Carrow Priory. • over the capacity of the East Norwich sites - detailed HIA is required to inform the development/allocation potential of the sites; 2. The Broads Authority suggest some modifications re. navigation, mapping and the combined approach to the East Norwich sites; 3. The area is a long-term prospect with a high level of constraints and a history of non-delivery. Evidence does not suggest that the sites will come forward. 4. The area includes a County Wildlife Site. Clear policy is required to assess the acceptability of proposals that will affect it. 5. Covid-19 has changed home buyers' priorities (seek outdoor space + rural locations). Question whether demand exists for 4,000 dwellings in the area.
Elsewhere in the urban area	<ol style="list-style-type: none"> 1. Over reliance on the Growth Triangle for delivery within the plan period; 2. Thorpe St Andrew has no new allocations despite the availability of sites; 3. The parish of Honingham has been inappropriately classified as Urban Fringe in association with Easton (Honingham is a rural village).
Distribution and delivery of growth	<ol style="list-style-type: none"> 1. The GNLP is overly reliant upon sites in the Norwich Urban Area, risking market saturation and slow delivery rates. 2. Numerous allocations (75%) have been carried forward from previous local plans and have a track record of not delivering, with no promoter or developer on board. Some have a reliance upon public sector funding + public sector intervention to remedy market failure. 3. Historic England have concerns re. housing figures - Heritage Impact Assessments are required to test and inform the capacity of sites. 4. Insufficient account has been taken of the decrease in retailing in Norwich, which provides for significant redevelopment to housing. 5. Suggested solutions to 1 to 3 above include: <ul style="list-style-type: none"> • New settlement/s; • More rural development.

Contingency	<ol style="list-style-type: none"> 1. The contingency site at Costessey is likely to be ineffective due to constraints. Multiple contingency sites should have been identified in a variety of locations and the trigger mechanism should be earlier than three years. 2. There is already saturation of allocation sites in the Norwich Urban Area, the contingency site compounds the issue. Under delivery would be better addressed through a more robust evidence-based supply and monitoring.
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Policy 7.2 Main Towns

Topic	Main Issues raised
Aylsham	<ol style="list-style-type: none"> 1. Opposition from the Town Council and residents about both the site allocations and the process for their selection, focussing primarily on the addition of the Norwich Road site (GNLP0596R) being an increase of 83% in new homes from Reg.18 to Reg.19. Arguments against the allocation of 550 homes include: <ul style="list-style-type: none"> • Pressures on infrastructure – on schools, doctors, highways, parking, water supply and sewerage; • The lack of public consultation, and engagement with the Town Council, between Regulation 18C and Regulation 19 is criticised. • The GNLP should be withdrawn and re-consulted upon. 2. Support from a development promoter in Aylsham for the policy as written being consistent with para. 72 of the NPPF.
Diss (with part of Roydon)	<p>Site promoters state that:</p> <ol style="list-style-type: none"> 1. Allocations in Diss are disproportionately low compared to other Main Towns; 2. Housing allocations, including for older people's housing, should not be devolved to the Neighbourhood Plan; 3. The GNLP should have addressed perceived highways constraints, as opposed to using this matter to limit growth in a highly sustainable town.
Long Stratton	<p>Land promoters argue that the existing strategic allocation may not be deliverable and the GNLP should include a trigger for a review of allocations if the funding bid for the bypass is unsuccessful.</p>
Wymondham	<ol style="list-style-type: none"> 1. Support from the promoters of Silfield Garden Village (SGV) for the approach as drafted limiting piecemeal 'edge' growth. SGV would enable: <ul style="list-style-type: none"> • protection the strategic gap between Wymondham and Hethersett and • mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park. 2. Challenges from promoters of sites on the edge of the town include: <ul style="list-style-type: none"> • 'mixed messages' with contingency sites included in Reg. 18C; • the low level of growth is contrary to the town's inherent sustainability and location on the A11 Cambridge to Norwich Tech Corridor; • further growth would be supported by improvements to water capacity proposed by Anglia Water and improved access to the railway station; • 'rolling over' the existing strategic gap policy to Hethersett without a new assessment is unsound; • the development strategy for Wymondham effectively ends by 2030 on the basis that most AAP allocations will be completed by 2026, with approximately 500 dwellings to be delivered beyond that date.

Policy 7.3 Key Service Centres

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. Developers and site promoters suggest the distribution through the settlement hierarchy and/or within KSCs is disproportionate and Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham should have further allocations;2. Policy 7.3 does not provide for educational or care/retirement housing needs in Hethersett or support provision of sports facilities;3. Policy 7.3 should refer to the GI strategy rather than GI maps reproduced in GNLP strategy document;4. Mulbarton, Horford and Scole should be redefined as KSCs.

Policy 7.4 Village Clusters

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. There are a number of objections to the production of a separate South Norfolk Village Clusters plan. Concern about conflicting policies, an increase in excess of the minimum 1,200 homes not being in accordance with the NPPF. As the spread of development in SN not known, the overall environmental impact has not been assessed;2. Insufficient mention or consideration of self/custom build;3. Too much growth in village clusters/objection to dispersal;4. Too little growth in village clusters, some of the increase in numbers between Regs. 18C and 19 should have gone to villages;5. Appraisal of settlement boundaries should be undertaken;6. Policy does not allow for growth and expansion of rural businesses, impact of Covid-19 not adequately assessed, approach to employment overly restrictive;7. Policy fails to prioritise rural brownfield sites;8. Objection to the classification of Horsford as a village cluster rather than a KSC.

Policy 7.5 Small Scale Windfall Housing Development

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. The policy is not clear on how it will operate in general and in relation to self-build;2. The policy is contrary to other policies and aims of the plan to promote sustainable development. It promotes development in unsustainable locations which are not well related to services and promote car use and carbon emissions;3. The split between parishes for 3 or 5 dwellings is too crude and has monitoring and implementation issues;4. The policy does not deliver affordable housing (larger allocations would);5. Sites adjacent to groups of dwellings without a settlement boundary are isolated dwellings in the countryside and therefore contrary to the NPPF;6. The policy should allow for higher levels of growth e.g. 3 or 5 per site not per parish, or sites up to 9;7. The "First past the post" approach is unworkable and is not sound;8. The policy does not support rural growth;

	9. Windfall and homes achieved from policy 7.5 should not be included in Table 6.
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Policy 7.6 – Preparing for New Settlements

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none"> 1. The policy pre-determines work that has yet to take place on the future distribution of growth; 2. There is no evidence that sustainable extensions to existing settlements have been exhausted; 3. Evidence from elsewhere demonstrates that new settlements struggle to provide affordable housing, particularly in their early stages; 4. There is a need for extensive evidence on viability, deliverability and infrastructure requirements; 5. There is a need for landscape character and heritage impact assessments (Historic England); 6. There is a lack of and need for consultation and engagement; 7. New settlements should be allocated now as they are more deliverable than some allocations.

Appendices

Topic	Main Issues raised
Appendix 1 - Infrastructure	<ol style="list-style-type: none"> 1. Sewage treatment in Aylsham - there should be a clearer plan to address capacity shortfall before any housing development; 2. There is a shortfall of provision in all aspects of health care; 3. Police infrastructure requirements (based on forthcoming evidence) should be included in Appendix 1, with a cross reference to Policy 4; 4. No infrastructure needs have been identified for Hingham, despite the cumulative impacts of development in the town.
Appendix 2 – Glossary	<ol style="list-style-type: none"> 1. Definitions for Listed Building, Local List and Registered Park and Gardens are required. 2. Change Scheduled Ancient Monument to Scheduled Monument.
Appendix 3 - Monitoring	<ol style="list-style-type: none"> 1. The plan is not carbon audited. It is not in line with the Climate Change Act (2008) as required by national policy and guidance; and is unsound in relation to the duties around mitigation; 2. The GNDP councils are significantly behind many leading authorities which have developed binding policies requiring new development to be net zero carbon, reducing carbon emissions in relation to retro-fitting buildings, energy generation and transport.
Appendix 6 – Housing Trajectory	<ol style="list-style-type: none"> 1. A site-by-site list showing the anticipated delivery of housing to evidence the trajectory is needed. 2. The divorcing of the village clusters plan from the GNLP means there is no evidence of the 1,200 homes expected from this part of the plan being deliverable.

2. The Sites

Introduction

- Lack of Heritage Impact Assessments. Insufficient information about the historic environment to support allocations, assessments don't follow Historic England methodology;
- Objections to separate South Norfolk Village Clusters plan.

Norwich

General Comments:

- Cllr Lesley Grahame and Green party representations suggest that: "Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target" for a number of sites within Norwich.

Policy CC2, 10-14 Ber Street:

- Historic England suggest key listed buildings affected by the development should be referenced. Policy wording should also reference 'Area of Main Archaeological Interest'

Policy CC4a, Rose Lane and Mountergate, land at Mountergate West:

- Anglian Water suggest additional policy criteria on existing surface water sewer on site.
- Cllr Lesley Grahame suggests that Rose Lane community garden should be a green space allocation. Employment welcome but must be compatible with high density residential.

Policy CC4b, Rose Lane and Mountergate, land at Mountergate East:

- The landowner's agent objects to the policy approach to the privately owned designated open space and the approach to landmark buildings. They also seek amendment to the uses on site to include a care home and remove educational facilities.
- Broads Authority request inclusion of early consultation with them in supporting text.

Policy CC7, King Street/Hobrough Lane includes 125-129 King Street and 131-133 King Street and Hoburgh Lane:

- Suggestion from landowner that policy should include criteria for viability appraisal at application stage due to difficult site constraints. Also requests acknowledgement of Norwich City Council's role in providing riverside access.
- Historic England require archaeological assessment to be included in policy criteria.
- Cllr Lesley Grahame suggests that the development must protect existing trees on site & provide proposed river access and walk.

Policy CC8, King Street, King Street Stores:

- Historic England suggest additional policy criteria requiring trial trenching prior to development.
- Policy intention to recreate historic streetscape should be replaced with priority to retrain the mature trees lining the boundary of the site (note that trees have TPOs).
- Cllr Lesley Grahame, Norwich Green Party and Historic England support retention of locally listed buildings on site.

Policy CC10, Land at Garden Street and Rouen Road:

- Policy criterion 1 & 2 are exactly the same, the repeated second point should be deleted.

Policy CC11, Argyle Street:

- Historic England suggest Archaeological Investigation requirement should be included in the policy criterion.

Policy CC15, Lower Clarence Road, car park:

- Policy should list nearby statutory listed buildings.
- Existing trees and hedges should be retained.
- Clause 2 is unclear regarding what is meant by 'built frontages'.

Policy CC16, Kerrison Road: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way:

- Site promoter does not support provision of a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area, but would support wording change to: *"Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area"*.
- Cllr Lesley Grahame would like to add 2 further points – re-opening of train halt at Trowse + provision of open amenity space.
- Clarification required relating to numbers as there are consents on this site.
- Policy relating to river frontage relates to elements that have now commenced on site.
- Broads Authority suggest early engagement with them is added to supporting text.
- Approach to car free/low car housing should be consistent throughout relevant allocation policies.

Policies CC17 a and CC17b, Land at Whitefriars, Barrack Street:

- Sites referenced CC17a and CC17b are not being carried forward under these boundaries/policies. They have been replaced with GNLPO409AR and GNLPO409BR. It is assumed that the representation made here relates to the new site references: *"This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation"*

Policy CC18 (CC19), Oak Street and Sussex Street:

- Historic England suggest reference to the Area of Main Archaeological Interest and requirement to produce an archaeological assessment are included in policy criterion.

Policy CC24, Bethel Street, land rear of City Hall:

- Historic England suggest reference to the Area of Main Archaeological Interest.

Policy CC30, Westwick Street car park:

- Historic England - need for a policy requirement for archaeological assessment.

Policy R1, The Neatmarket, Hall Road:

- Promoting agent suggests greater flexibility of use classes in spirit of new class E; also, that wording relating to junction improvements should revert to that in existing policy.

Policy R13, Gas Hill, Site of former Gas Holder:

- Norwich Green Party and Cllr Lesley Grahame advocate retaining this site as woodland for biodiversity and climate objectives given the acknowledged constraints of the site.

Policy R17, Dibden Road, Van Dal Shoes and car park:

- The site promoter objects to the criterion relating to retention/reuse of existing buildings. Wording requiring '*high quality, locally distinctive design*' repeats requirements of strategic policies & places undue emphasis on this site which is misleading.

Policy GNLP0068, Duke Street, land adjoining Premier Inn and River Wensum:

- Historic England suggest inclusion of reference to Area of Main Archaeological Interest.

Policy GNLP0133BR, Land adjoining the Enterprise Centre Earlham Hall (walled garden and nursery):

- Historic England suggest a Heritage Impact Assessment is required for the whole campus.

Policy GNLP0133C, Bluebell Road (UEA, land north of Cow Drive):

- Anglian Water - existing water mains on site, suggest inclusion in policy.

Policy GNLP0133DR, Land between Suffolk Walk and Bluebell Road:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities.

- Historic England suggest a Heritage Impact Assessment (HIA) is required for whole campus.
- Comprehensive objection from Yare Valley society – allocation is contrary to national and local policies, the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0133E, UEA Grounds Depot:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities. Suggest allocation removes building works in this area to protect green corridor of the Yare Valley.
- Support from Environment Agency as development is sited in Flood Zone 1 area of allocation site & is in accordance with SFRA & previous EA comments.
- Support from site promoter subject to suggested changes to be more flexible regarding scale and massing of allowed development & difficulty in achieving cycle & pedestrian connections to sites outside of their ownership.
- Comprehensive/substantial objection from Yare Valley society – allocation is contrary to national and local policies as well as inconsistent with strategic policies of the GNLP; the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0401, Duke Street, former EEB site (Dukes' Wharf):

- Minor typographical/wording suggestions from Broads Authority.
- Support from Environment Agency and Historic England.
- Additional criteria relating to existing water main suggested by Anglian Water.

Policy GNLP0409AR, Land at Whitefriars:

- Support from Environment Agency – ‘text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis’.
- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested revisions to/re-ordering of policy wording by Historic England. Suggest inclusion of reference to Area of Main Archaeological Interest. Suggest a Heritage Impact Assessment is required for this site.

Policy GNLP0409BR, Land at Barrack Street:

- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested minor revision to policy wording by Historic England. Suggest a Heritage Impact Assessment is required for this site.

- **Objection from Site promoter** - Mixed use requirement is not evidenced to be viable or deliverable, the allocation is inconsistent with strategic policies. The inconsistency of parking policies between local authority areas throughout the plan undermines the attractiveness of City sites for business/employment uses. Suggestion that the site boundary is not correct (*however, boundary is in accordance with site promoter's reg 18C representation*). Sustainability Appraisal is misleading as it refers to expired consents for this site. Site promoter has provided suggested alternative allocation policy wording.

Policy GNLP0451, Queens Road and Surrey Street, land east of Sentinel House:

- Objection from site promoter on behalf of developer – the site has extant consent for student accommodation due to commence on site summer 2021. The site allocation policy is considered unsound for three reasons: i) Unjustified and ineffective heritage requirements. ii) Unjustified and ineffective approach to affordable housing. iii) Unjustified and ineffective approach to landscaping and biodiversity. (Suggested revision to policy wording to make sound provided by agent)
- Minor alterations to wording and reference to the Area of Main Archaeological Interest into the policy suggested by Historic England.

Policy GNLP0506, Anglia Square:

- Agent on behalf of site developer – suggests that the site boundary should be extended to include the area underneath the flyover. A comprehensive suggestion for revised supporting text has been provided by the agent. The agent has also suggested a comprehensive review of the allocation policy wording.
- Additional criteria relating to existing water mains, foul and surface water sewers suggested by Anglian Water.
- Significant concerns raised by Historic England relating to scale height and density. Suggestion that the allocation figure should be reduced from the current 800 to 600. Aside from housing, the permissible extent of other development on site is unclear. A Heritage Impact Assessment (HIA) should be prepared for the site. Suggested reinstatement of historic street pattern and suggested wording revision provided to policy.
- Comprehensive objection from Norwich Green Party – consider the policy repeats the same elements which lead to a lack of public support for the rejected scheme. 800 homes should be a maximum and this figure should include any potential student accommodation. Objection raises issues relating to: existing artistic community, provision of multi-storey car park/carbon emissions, more ambitious energy efficient design, landmark building. Proposal should reflect medieval street pattern, reference green open space and high-quality landscaping; low car environment.

Policy GNLP1061R, Land north of Norwich International Airport, Imperial Park:

- Historic England suggest reference to nearby Horsham St Faith Conservation area and heritage assets is made within policy.
- Site promoter on behalf of site owner supports an allocation subject to changes to policy requirements. Site boundary to be extended to include land at Petans, policy needs to provide a mixture of aviation and non-aviation uses in line with endorsed airport masterplan (current policy wording is inconsistent and overly restrictive). Ancillary uses should also be allowed to make site more sustainable.

Policy GNLP2114, Muspole Street, St Georges Works:

- Objection from site promoter. 110 homes, 5,000 sqm offices/managed workspace and potentially other ancillary uses is not achievable. Revised wording suggested.

Policy GNLP3054, Duke Street, St Marys Works:

- Historic England suggest that a detailed HIA is prepared for this site. Minor amendment of policy wording and reference to the Area of Main Archaeological Interest into the policy suggested.
- Site promoter objection – number of homes should not be ‘minimum’ but ‘in the region or order of’. The requirement to justify the housing type against a local community need is not considered to be justified or consistent with national policy. Suggestion that policy is amended to allow full or part retention of the locally listed building. Suggested revision to policy wording provided in representation.

East Norwich Strategic Regeneration Area

- Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the success or otherwise of the project.
- Opportunity to provide pedestrian and cycle links to Whitlingham enabling reduced carbon emissions through sustainable modes of transport.
- Introduction of a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, add noise and pollution, reduce air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas.
- Resident consultation is vital in the design and development of this new site.
- Low car development would reduce harm. Energy efficiency standards should reflect the best aspirations.
- Suggest opening former rail halt at Trowse to serve ENSRA & County Hall + bus connections to UEA, NRP & N+N Hospital.
- Potential impact of ENSRA on Whitlingham Country Park should be mitigated by extending the country park to cater for increased demands.
- The area is prone to flooding and development will need to mitigate against this risk.
- Any energy generation should be from recognisably clean sources (not combustion).

- Policy map should show area of utilities site in the Broads Local Authority area (allocated in their adopted local plan)
- The functioning of existing Carrow Yacht Club should be protected in the policy.
- The presence of County Wildlife Site does not preclude development, and this should be made clear in the allocation policy.
- Environment Agency *"Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNLP0360 due to being Flood Zone 3b, and there is no mention on the need to not increase flood risk elsewhere and therefore provide flood storage. There is lots of mention of 'flood resilient construction' when this tends to mean the buildings can recover from a flood, while we would require buildings to have raised floor levels to prevent them flooding in the first place. It is however possible that perhaps this is just differing terminology and the intention is the same as us. It is positive that the SFRA Site Summary Table includes lots of detail as to what is required to develop the site, so therefore this information should be covered here."*
- Historic England raise significant concern with the proposed number of dwellings allocated which may have a harmful impact on the historic environment (there are numerous heritage assets on this site). Strongly advise that a HIA is prepared for ENSRA sites. Some suggested amendment to wording has been provided by Historic England.
- Dentons suggests that the viability and therefore deliverability is not sufficiently evidenced. This should not be deferred to an SPD stage. The requirements of the ENSRA SPD have not been adequately established in policy 7.1 and site allocation GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective.
- Rosconn Group – No evidence that ENSRA will realistically yield this level of development in GNLP plan period. Significant Infrastructure requirements and flood risk indicates that site is more appropriate for long term than medium-long term. L2SFRA indicates areas of land in floodplain likely to affect amount of land available for development & mitigation needed. But no sequential test evidence is provided to demonstrate selection of these sites instead of sites elsewhere.

Norwich Site Assessment Booklet:

- Site GNLP0478 (Land east of Green Lane West) has not been allocated due to Highways related reasons – it is suggested that an engineered solution could be found & that the site should be allocated.
- Land allocated at Colney Hall is misleading to allocate the entire area as it contains historic parkland that should not be developed & which is outside of the development boundary.
- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford. The number of homes allocated does not respect the figure of 1,200 in the adopted Cringleford Neighbourhood Plan. The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase

over planned residential dwellings without providing evidence of need for the additional housing in Cringleford. Challenge that the plan meets the criteria of compliance with duty to cooperate (disregard of neighbourhood plan & parish council comments to previous consultations).

- Historic England suggest site assessments appear to be lacking. The assessments do not follow the 5-step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was recommended at reg 18 but has not been carried out. Concerns regarding the indicative capacity of a number of sites. HE considers that Norwich's historic character is under pressure. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City.

Urban Fringe

- **Historic England** - The changes made to Site Policies in view of comments made at Reg 18 are welcomed. Continue to advise that **Heritage Impact Assessments (HIAs)** should be prepared in advance of the EiP. This applies to Colney Hall GNLPO253 in particular.
- **Costessey** - COS3/GNLPSL2008 (Overwood Lane) changes to Settlement limit suggested.
- **KES2 employment site** has the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace so expansion suggested.
- Further evidence of Housing Need is required to justify increase in numbers at **Cringleford** in relation to NP and site allocated with uplift.
- **Showground, Costessey** COS5/GNLP2074
 - amendments suggested to include small restaurants, café, PH, etc.
 - retail and leisure will add greatly to the over stretched local road network and contradicts Policy 2 of Neighbourhood Plan.
- The site at **Farmland Road, Costessey**, offers an appropriate opportunity to deliver growth in a manner that is appropriate.
- **Drayton Site DRA1** - Carried Forward Sites / Planning permissions / GNLP Policy Requirements require update to reflect permissions.
- **Drayton – GNLP0290** (unallocated) Recommended changes to Policy 5 to enable viability of care homes, and Policy 3- as it does not specifically refer to CWS - proposed amended text to set out a clear benefit a development can provide, such as a 10% biodiversity net gain.
- **Taverham site 0337R** should include Police Station Norfolk Constabulary / NPS (DTC)
- **Code Developments** – (Horsford) on behalf of Drayton Farms - The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337(Taverham), identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites **GNLP0332R and GNLP0334R (Hellesdon**

north) as site assessment is not transparent. Legal opinion obtained. Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. Site HEL4/GNLP1019 allocated for Open Space should be deleted and considered for housing under sites GNLP0332R and GNLP0334R instead.

- **Code Developments** – Hellesdon (on behalf of Jarrolds) – objects to Site Assessment and outcome of not allocating clients' Site GNLP2173 – for Housing. There are inconsistencies in Site Assessment and SA Report approach taken between HEL1 'carried fwd sites' and 'new sites' GNLP2173.
- **Easton PC** – DTC – Easton EAS 1: - objection to the additional 90 dwellings on the last parcel of allocated land, to the east of Easton Gymnastics Club.
- **Lanpro** – Rackheath – GNLP2166 should be allocated for 200 dwellings as unlikely to impact to Rackheath Hall unlike GNLP0132
- **La Ronde Wright** - Sprowston – New site promoted - west of Blue Boar Lane near garden centre - unallocated in the GT AAP
- **Bidwells** Sprowston - GNLP0132 – Request flexibility on affordable housing requirement due to infrastructure requirements for High School and additional requirements by AW for pumping station to serve the surrounding area.
- **Sprowston** - Request that GNLP3024 is allocated for mix and community uses to complement nearby housing developments.
- **Norfolk Wildlife Trust** – Sprowston - recommended text modification to site GNLP0132 adjacent to Ancient Woodland -GI requirement
- The **SFRAs** done are defective as maps have not been followed through properly. With regards to the NEG, massive development has been approved within a massive flood plain that is close to sea level and where tidal effects are observable for miles.
- **Broads Authority**- recommended text for clarity for Policy 3 with respects to the built and historic environment. heritage impact assessment is required by government guidance for any application that affects any heritage asset or their setting.

Main Towns

Aylsham

- Substantial objections from 65 residents, as well as Aylsham Town Council, concentrating on the addition of GNLP0596R, and the increase in housing requirement to 550 new dwellings, without further consultation prior to progressing to the Regulation 19 stage. The soundness of the GNLP is challenged, in respect to its evidence and justification for the housing allocated. Issues include the demand on infrastructure such as highways and education provision, and sewerage capacity.
- An objection from the promoters of site GNLP0336 west of A140 argues for the inclusion of their site - the assessment process failed to take account of a variation of their proposal that would provide 150 homes instead of 300 homes.

- In relation to GNLP0596R on Norwich Road the promoter has reiterated their support for the site's allocation, whilst clarifying that the policy should be amended to exclude pedestrian connections via Copeman Road. Historic England raises the potential impact on the nearby Grade II Diggins Farmhouse. A minor modification put forward by Anglian Water is to amend the policy wording to allow for access to maintain the foul drainage infrastructure running through the site.
- In relation to GNLP0311/0595/2060 on Burgh Road the promoter has reiterated their support for the allocation, whilst suggesting minor modifications to reduce the carriageway width, and to clarify that their obligation is to provide land for the school (and not the school itself). A minor modification is put forward by Anglian Water to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the site.

Diss

- Objections from promoters that focus upon the strategic growth figure for Diss, and the devolution of site allocations to the Neighbourhood Plan. Sites in question include: DIS1, DIS3, GNLP0250/0342/0291, GNLP0599, GNLP1044, and GNLP1045.
- Diss Town Council state that a footway/cycleway is required as part of GNLP01022 (Frontier Site) northwards towards to join Frenze Hall Lane.

Harleston

- Minor modifications are put forward by Anglian Water to allocation policies GNLP2108, GNLP2136, HAR 4, HAR 5, and HAR 6 to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the sites.
- A development promoter wishes to see the settlement boundary to the south of Harleston redrawn around GNLP2109 and GNLP2136.

Hethel (Strategic Employment Area)

- The settlement boundary should be updated, reflecting changes such as the development of the Classic Team Lotus building.
- Norfolk Wildlife Trust states that policies should specifically address potential impacts on the County Wildlife Site and ancient woodland from impacts including encroachment and light pollution.
- Historic England state that policies should mention the impacts on nearby Grade II listed Little Potash/Brunel House and Corporation Farmhouse.
- Promoters on behalf of Goff Petroleum object to the non-allocation of their site for a new energy research centre (site reference GNLP0116R).

Long Stratton

- The strategic approach to Long Stratton should be changed, with promoters arguing for inclusion of their site GNLP0354, GNLP4033, and GNLP4034.

Wymondham

- The strategic approach to Wymondham should be changed, with promoters arguing for inclusion of their sites GNLP006 (north Wymondham) and GNLP0320 (south of Gonville Hall Farm).

- A generic comment from the Environment Agency for all Wymondham site allocations states that the latest version of the Water Cycle Study shows that Wymondham Water Recycling Centre will be over capacity post growth. The latest findings and recommendations from the WCS should be incorporated and reflected in the Local Plans and Site Allocations.

Key Service Centres

- Broads Authority would like dark skies consideration inserted into Acle site policy;
- Acle site promoter wants additional policy requirement for phasing plan for road;
- In Acle, Brundall, Hethersett, Hingham, Loddon, Anglian Water requests additional policy and supporting text elements in some sites with underlying water assets;
- Developers and site promoters suggest sites in Blofield should be allocated/included in settlement boundary;
- Pigeon proposed a school on GNLP0352 in Brundall, but this use was not assessed;
- Brundall BRU2 Unsound to allocate for open space as housing permitted and development has commenced;
- Page 40 of Hethersett site assessment booklet contains an error in that the site descriptions have been set under the wrong heading;
- Site GNLP0503 in Hingham has been withdrawn during Reg19;
- GNLP0520 Hingham Site policy for surface water only deals with site, not lower surrounding areas;
- Chedgrave PC considers duty to co-operate has been failed, entire process has been inadequate re involvement of public.
- Richard Bacon: Plan does little to address education needs in Poringland. NCC has need and funding allocation for primary school in Poringland, plan should address this.
- Reepham GNLP0353R in 2019 use changed to include employment land 1.6ha (as well as housing and potential expansion of GP). Part 1 booklet neglects to mention employment. Rep has not been taken into account when selecting sites contrary to reg 18(3) which requires all reps taken into account. Reg18C rep repeated employment, and submitted access strategy. Highways view unchanged. (NB site booklet did not include employment in table stage 1 (part 3, post-reg18c) but correct description in stage 4.)
- Reepham REP1 allocation is not deliverable, as evidenced by application 20200847, viability information of which shows 141 homes, only 20% affordable housing, and sports hall on alternative site (stated by developer).
- Unsound not to allocate housing in Poringland, partly due to dispersal strategy. Commitment has reduced as housing has been delivered in the village. GNLP0494R is suitable, available, deliverable. Site access given as constraint, but access was not disputed by Highways Authority in recent application 2017/2871. For GNLP0485R, **failed to consider school and country park while pressing need for school in Poringland and GI in Greater Norwich**. Highways Authority have not considered evidence submitted during Reg18C.

- Hingham booklet: contradictions in site assessments, decisions on some sites are flawed, not based on proportionate evidence. Highway Authority evidence is disputed, mitigation afforded to allocated sites could be applied to other sites. No reference to town centre. Conclusion in booklet justifies predetermined decision to allocate 0520.

Broadland Village Clusters

- Anglian Water objections regarding assets within the boundary of allocated sites, requesting new text and policy requirement (BLO5, 0297, FOU2, 0264, HNF1, 0188);
- Foulsham – significant opposition focussing on issues of historic hedgerow and access;
- Horsford – recent flooding being investigated by NCC;
- Horsham St Faith – increase in numbers without consultation, Historic England objection – request for HIA;
- Lingwood – introduction of 4016 without consultation;
- Marsham – alternative site 3035, Historic England objection – request for HIA;
- Lack of allocation in Great and Little Plumstead cluster;
- Reedham – lack of consistency – no safe route to school;
- South Walsham – potential change of access point.

Non-Residential

- Policy BKE3 -- Brooke Industrial Estate – Norfolk Wildlife Trust request policy update to include an ecological assessment to reflect proximity to Atlas Gravel Workings CWS.
- **Review of strategic gaps** required. The promoter of GNL0177-BR has completed an initial assessment for the Hethersett- Cringleford strategic gap. They argue that development can be accommodated without resulting in coalescence between the two settlements.

Costessey Contingency Site

- **Historic England** – A Heritage Impact Assessment be undertaken.
- **Code Developments** – Additional contingency sites should be identified.
- **Barton Wilmore** – As the site can deliver educational land at the beginning of the period it should be a full allocation. Revisions to site policy include 977 dwellings @35 dph.
- **Client Earth** - Site could contribute towards the urbanisation of countryside.
- **Various sites** suggested for allocation instead of having a contingency site.

3. Evidence Studies

Equalities Impact Assessment

- Highway safety concerns (Raised by Hingham Town Council – specific to Hingham)

Green Infrastructure Study

- Hingham Conservation area is out of date, the boundary was revised in 2016.
Need to know if any other boundaries used are out of date.

Gypsy and Travellers

- The Gypsy/Traveller Accommodation Assessment is flawed, failing to take proper account of need and supply;
- Accusations of improprieties in planning overall leading to extensive breaches of Human Rights and Equalities legislation.

Habitat Regulations Assessment (HRA)

- Not legally compliant – HRA incomplete.
- Not sound – inadequate evidence to demonstrate that no adverse effects on European Sites (incomplete HRA) (both Norfolk Wildlife Trust).

HELAA

- Incorrect HELAA assessment of sites at Coltishall and Silfield Garden Village

Statement of Consultation

- Lack of Reg 18d consultation for people to have their say
- SNC SCI not complied with and consultation not on the 'Have your Say' page of the SNC website

Strategic Flood Risk Assessment

- Fundamental concern with the production and use of FRAs and SFRAs for development sites – not just locally, but nationally;
- A single map linking the all groundwater flood susceptibility areas in GNLP and one for Surface Water flood areas would give a holistic picture for these matters in the GNLP area;
- It is surprising that maps showing the extent of major floods have not been produced;

- It would be informative if planners published information on the number and location of flooded properties in their area in the last 50 years and the dates when these properties were built;
- Allocation of site on land north of Tutttles Lane East, Wymondham (currently unallocated) is suggested would alleviate flood issues related to the river Tiffey.

Sustainability Appraisal

- Spatial strategy is not justified – other reasonable alternatives have not been properly appraised;
- SA is flawed in its assessment of specific sites and consideration of alternatives (inc strategic alternatives e.g. Hethersett / Cringleford, Silfield Garden Village proposal, Long Stratton);
- SA findings support a different approach to site allocation – avoiding as far as possible new development on greenfield land and in unsustainable locations (e.g. KSCs and villages);
- Contingency sites not justified (based on size and not speed of delivery);
- Carried forward allocations have not been treated comparably with other sites (no evidence or proper assessment);
- SA is inadequate in terms of carbon assessment and addressing climate change.

Viability Study

- Benchmark Land Value (BLV) -- £100,000/acre is not justified. The £348,000/acre adopted in the 2017 Hamson CIL is fully supported by a respondent.
- Typology 11 (strategic sites) – the gross to net areas assumption is unrealistic. To achieve 88% net to gross site area on a Typology 11 development is not practical or feasible in reality.
- Revenue Assumptions are not sound – concern exists that the private sale revenues assessed in the Viability Appraisal remains excessive. Using the housebuilder's actual sale prices (all of which are publicly accessible on Land Registry), the range of values recorded was £1,866/m² to £3,634/m².
- Developer Profit on Gross Development Value (GDV)– the reduction from 20% to 17.5%. The reduction in developer profit is un-justified.
- Build costs for apartments –the appropriate BCIS rate should be applied.
- The Viability Appraisal does not include a typology to fit the East Norwich Strategic Regeneration Area and specific viability appraisals for strategic sites are not provided.
- Sales-values, build costs and benchmark land values are too generic and not backed up by comparable evidence.

Water Cycle Study

Summary of main issues raised:

- Not legally compliant – WCS incomplete and so insufficient evidence to meet Habitat Regulations
- Not sound – WCS incomplete so insufficient evidence on water quality to show no impacts on SACs (both Norfolk Wildlife Trust).