

**EVIDENCE BASE STUDIES - SUMMARIES**

## ENERGY INFRASTRUCTURE STUDY

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Greater Norwich Energy Infrastructure Study (March 2019)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
20597 Climate Friendly Policy and Planning	Object	<p>29 The comments in this section have been kindly provided the Norfolk Community Solar, and are reproduced with his permission.</p> <p>The EIS is promising, but we highlight concern to the frequent references to CHP (if biomass or fossil gas fired), gas boilers and diesel generators. No fossil fuel or burning technology should be encouraged in the plan in the Climate Emergency and for Air Quality reasons.</p> <p>31 The report is light on some specifics:</p> <ul style="list-style-type: none"> <li>i. Inclusion of energy storage as part of the flexibility solution</li> <li>ii. No mention of community energy, although despite promoting ESCos. The plan could significantly support community energy</li> </ul>	The EIS is promising, but concerns over some detailed aspects (listed).

	<p>schemes via ESCos, as per EIS page 47 "The potential for local authorities to be involved within this type of approach [ESCO] is being explored further in an additional study investigating appetite for local investment and suitability of public, private or hybrid investment model approaches.</p> <p>iii. No mention of microgrids, although semi-islanded developments are mentioned. The plan could provide pro-active policy support to promote development of these.</p> <p>iv. There could have been more specific recommendations such as solar car ports</p> <p>v. Grid connection capacity bagging ahead of building should not be tolerated beyond a limited period.</p> <p>vi. The Electricity tariff of 11p/kWh set in the case study (EIS, page 40) is far too low - making the business case for the proposed scheme appear less viable, despite a healthy looking 8.3% IRR.</p> <p>vii. The exclusion of community energy shares, or any non-developer commercial interests, in any of the discussion, which could substantially change the costs and look of projects, is a big omission. Denmark, Sweden, Germany and even Scotland are much more switched on to this why not Greater Norwich?</p> <p>32 Throw away comments in the CONS document e.g.: CONS, page 39 (Climate Change statement) Encourage community-led initiatives such as the promotion of decentralised, renewable and low carbon energy use or securing land for local food sourcing, and CONS, page 101, Policy 7.1 providing for sustainable energy generation, including</p>	
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		a local energy network serving the area as a whole need much more development within the plan.	
22240 Client Earth	Comment	<p>In September 2019, we wrote to the Greater Norwich planning authorities about the need to integrate emissions reduction objectives throughout local plan policy. We are therefore pleased to see a commitment in the draft strategy to ensure policies in the GNLP contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local targets, statements and plans (p. 40). We also welcome the statement that policies in the GNLP will need to contribute to national targets to reduce emissions [and] plan for transition to a post-carbon economy and that mitigating climate change is a cornerstone of the GNLP (paras 82 and 86).</p> <p>However, we are concerned that these commitments have not in fact been met in the development of the proposed plan policies. It is not sufficient that the plan merely includes policies which address climate change mitigation (as suggested at para 140). Plan policies taken as a whole must be designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of climate change.<sup>1</sup> In this context, they must contribute to radical reductions in greenhouse gas emissions and take a proactive approach to mitigating climate change in line with the objectives and provisions of the Climate Change Act 2008.</p> <p>To comply with this obligation and the other law and policy requirements described in September letter, local planning authorities need to demonstrate that the proposed plan policies are expected to contribute to the mitigation of climate change. At a minimum, this means showing that the policies contribute to the delivery of the</p>	<p>Concerned that stated commitments in the Plan have not been met in the development of the policies.</p> <p>Plan policies taken as a whole must be designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of climate change.</p> <p>The policies should contribute to radical reductions in greenhouse gas emissions and take a proactive approach to mitigating climate change in line with the objectives and provisions of the Climate Change Act 2008.</p>

		<p>national 2050 target under the Climate Change Act 2008, which is a reduction in net greenhouse gas emissions of at least 100%.</p> <p>In respect of energy efficiency, we welcome the statement that the evidence and justification establish a clear need to set a local energy efficiency policy which goes beyond 2013 Building Regulations (p. 62). However, the accompanying statement that going further than a 20% improvement on Part L would not be viable would not appear to be supported by the Interim Viability Assessment (November 2019). In particular, it is not clear from the viability assessment that higher standards have been assessed. In this context, a zero carbon standard should be the starting point that is worked back from to the extent that any viability constraints are identified. Where there are viability constraints affecting a particular category of dwelling or scale of development, then standards should be reduced for that category or development size only, avoiding a lowest common denominator approach. It is also not clear where the £15,000 cost per dwelling figure for higher efficiency standards (cited at page 63 of the draft strategy) is derived from or to what standard this figure relates.</p> <p>2. The Energy Infrastructure report prepared in May 2019 i.e. before the introduction of the UKs net zero target concluded in the planning policies section and in the context of climate mitigation that these policies represent a medium level of ambition within the context of the existing constraints and wider national policy goals. (p. 44). This indicates that a higher level of policy ambition is possible, including in respect of renewable and low carbon energy generation, and that the proposed policies should be reviewed accordingly.</p>	<p>Local planning authorities need to demonstrate that the proposed plan policies are expected to contribute to the mitigation of climate change. At a minimum, this means showing that the policies contribute to the delivery of the national 2050 target under the Climate Change Act 2008, which is a reduction in net greenhouse gas emissions of at least 100%.</p> <p>The statement about a local energy efficiency policy is welcomed; however the limit of 20% improvement on Part L of Building Regs has not been justified e.g. in terms of viability.</p> <p>The Energy Infrastructure Report refers to a medium level</p>
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			of ambition in the policies, which indicates that a higher level of ambition is achievable, including in respect of renewable and low carbon energy generation, and so the proposed policies should be reviewed accordingly.
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## INTERIM HABITATS REGULATIONS ASSESSMENT

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Interim Habitats Regulations Assessment (HRA)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
21838 Natural England	Comment	<p>Natural England welcomes the production of the latest Habitats Regulations Assessment (HRA) report, dated December 2019, and prepared by The Landscape Partnership. We previously commented on the interim HRA in our response (dated 21 March 2018; our ref 235617) to the GNLP growth options and site proposals consultation.</p> <p>Please note under 1.6.1 that the final sentence should refer to Natural Resources Wales rather than one of its predecessors, Countryside Council for Wales.</p> <p>The designated sites have been identified correctly and we agree with the likely significant effects identified under 3.2.1. Under the second bullet point it would be good to amend the text as follows:</p>	<p>HRA welcomed.</p> <p>The designated sites and likely significant effects have been identified, but a rewording is suggested.</p> <p>Concerns have been expressed on the Local Plan in respect of whether the policies are sufficient to secure the delivery of the mitigation measures identified in</p>

		<p>ii. Increased pressure on water resources: The new homes and businesses would require a reliable source of drinking water.</p> <p>This would recognise that water is essential for both new residential and employment allocations, as well as potentially being required in the operation of some businesses beyond the usual daily hygiene requirements.</p> <p>As outlined in our response to the Local Plan above, Natural England has concerns whether the current wording and supporting text of various Plan policies are sufficient to secure the delivery of the mitigation measures identified in the HRA.</p>	the HRA.
22061 Norfolk Wildlife Trust	Comment	<p>There is a legal requirement for the plan to be accompanied by an HRA demonstrating that the plan will not result in any adverse effects on European Sites before the plan can be adopted. Our detailed comments are given below, but we wish to highlight our overall concerns with the conclusions drawn by the draft HRA issued at this stage. The conclusions that adverse effects on the River Wensum SAC and the suite of Broads European Sites appear to mostly depend on an evidence base being produced by third parties that is not yet complete. We therefore disagree with the overall conclusion of the draft HRA that there would be no adverse effects on European Sites either alone or in combination with other plans and projects. This issue will need resolving prior to publication of the submission version of the plan. We request a direct meeting with the Council and their consultants, ideally alongside other nature conservation bodies, as soon as possible after the consultation in order to discuss the outstanding actions required to ensure the HRA is completed satisfactorily in time for the submission stage.</p>	<p>The HRA relies on studies that are not yet complete, therefore it cannot yet be concluded that there are no adverse effects on European Sites. This will need to be resolved before publication of the submission version of the Plan (meeting requested to discuss this).</p>
22070	Comment	Habitats Regulations Assessment	Over reliance on third party reporting and an



<p>Norfolk Wildlife Trust</p>		<p>There appears to be an over-reliance in the HRA on third party reporting to provide evidence that adverse effects on Habitats Regulations sites can be avoided. The HRA presumes that the water cycle and recreational pressure studies will be delivered in time and able to cover all the points the HRA needs them to. There is a clear risk to delivery of the plan by relying on work by third parties which is not yet complete and the HRA appears to offer no indication regarding the completion of these studies in relation to the Local Plan production timetable. At this stage, we would expect the HRA to state the limitations of the evidence base, note the likely completion dates for the studies in comparison to the plan production schedule, and conclude that at this stage it is not possible to rule out adverse effects on several European Sites due to the need for third parties to complete their studies and for the recommendations of those studies to be accepted and be deliverable. There is a clear need for these studies to be completed and to be made publicly available for scrutiny before consultation on the final draft of the GNLP occurs.</p> <p>We are also concerned at the approach taken in section 8.2.2 of the HRA regarding the potential impacts of the NWL on the River Wensum SAC and the anticipated increases in traffic flows on the A146 from allocations on the Broads suite of European Sites. The HRA identifies Likely Significant Effects on these sites from growth promoted in the plan, but at the Appropriate Assessment stage in 8.2.2 of the HRA it proposes adding the following wording ~provided that it can be achieved without causing an adverse effect on the integrity of the [European Site]. We do not believe the addition of this wording is sufficient to ensure that the plan will avoid any adverse effects on the European Sites as it defers any assessment to the planning application stage without being able to provide any certainty that the project level HRA could be passed. Whilst the</p>	<p>assumption that studies will be delivered in time. This is a risk to the Plan.</p> <p>It is expected that the HRA would state the limitations of the evidence base and that it is not possible to rule out adverse effects at this stage. The studies need to be published before the next stage.</p> <p>Concerns over 8.2.2 re potential impacts of Norwich Western Link road, and whether the suggested wording is sufficient to avoid any adverse effects, as it defers an assessment to the planning application stage. Therefore, the HRA should conclude that adverse effects on the River Wensum SAC and the suite of Broads European Sites from these infrastructure elements promoted by the plan cannot be ruled</p>
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		<p>recommended wording is technically correct in that any planning application would need to demonstrate that it can avoid adverse effects on European Sites, this is a non-negotiable legal obligation required of planning applications, and referring to it in the Local Plan HRA is not proof that the adverse effects of the plan can be avoided. Therefore, until such time as robust evidence is provided that these adverse effects can be avoided through modifications to the plan, the HRA should be revised to conclude that adverse effects on the River Wensum SAC and the suite of Broads European Sites from these infrastructure elements promoted by the plan cannot be ruled out. Any allocations dependent on the delivery of this infrastructure are at risk of not being deliverable until such HRA issues are investigated and concluded robustly.</p> <p>We also note from survey effort to date the likely presence of a nationally significant breeding colony of barbastelle bats, one of the UKs rarest bat species. All UK bat species and their roosts are legally protected under the Wildlife &amp; Countryside Act and the Habitats Regulations, and advice from governments nature conservation advisors the Joint Nature Conservation Committee, is that due to their rarity, any barbastelle breeding site would qualify for designation as a Special Area of Conservation. Given the ecological value of land on the proposed western link route and the need for extensive further survey efforts to inform the impact assessment, we believe it is premature to conclude that this infrastructure proposal will be able to comply with the Habitats Regulations and gain consent.</p> <p>Section 11.4.1 of the HRA makes two references to other assessment work where the HRA presumes that HRA work carried out by a third party (footpaths being promoted by the County Council in Acle and Loddon) has ruled out adverse effects. We are</p>	<p>out. Any allocations dependent on the delivery of this infrastructure are at risk of not being deliverable until such HRA issues are investigated and concluded robustly.</p> <p>Also, there is a nationally significant breeding colony of Barbastelle bats that may be affected. Consequently it is premature to conclude that this infrastructure proposal will be able to comply with the Habitats Regulations and gain consent.</p> <p>Elsewhere, Section 11.4.1 refers to other assessments, in relation to Acle and Loddon, and presumes that a third party HRA has ruled out adverse effects. It should not be based on a presumption and so</p>
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		surprised that this conclusion has been reached based on a presumption rather than with direct reference to the HRA mentioned and recommend that further evidence is sought.	further evidence should be sought.
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## SUSTAINABILITY APPRAISAL

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Sustainability Appraisal
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 4 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
20596 Climate Friendly Policy and Planning	Comment	<p>Issues with baseline carbon emissions, budgets and targets</p> <p>8 Previous submissions by CEPP and NGP have made the case for baseline carbon emissions, budgets and targets to be developed for the GNLP in a numerically quantifiable, measurable and reportable form. The draft plan makes no progress compared to the JCS on this, and also includes some confusing elements. These are:</p> <p>(A) CONS bullet 84 introduces per capita CO2 footprints, whilst SA 2.11 (page 25) introduced the population-wide footprint (from the DBEIS data for UK local authority and regional carbon dioxide emissions national statistics). Whilst both ways of looking at the data (per capita or population-wide) are valid, it would be preferable to use just one. The population-wide footprint is the most appropriate as that relates directly to the overall CO2 budget available (see below).</p> <p>(B) No historic or future trend information is given. Any meaningful narrative around carbon emissions must be focussed around trends,</p>	<p>Reconsider the carbon footprint data in the Plan; the population wide footprint used in the SA is most appropriate.</p> <p>Trend information (past and future) is needed on carbon emissions.</p> <p>The test for assessing carbon</p>

	<p>and national policy is framed in targets (e.g. net-zero by 2050, or the Paris Agreement temperature target of 1.5degrees). Targets imply a journey to reach a target, and understanding trends, both real historic one and projected future ones, is necessary to understand the journey. (C) The for assessing carbon emissions in the SA is given at SA, Box 2.2 (page 25):</p> <p>Development proposals which could potentially increase the Plan area’s carbon emissions by 1% or more in comparison to the 2017 estimate would be expected to have a major negative impact for this objective. Development proposals which may be likely to increase the Plan area’s carbon emissions by 0.1% or more in comparison to the 2017 estimate would be expected to have a minor negative impact for this objective. It later becomes apparent in the SA (though it is not clear in the statement above), that the percentage increase in carbon emissions for the above test is calculated by simply calculating the increase in emissions based on new population and the current levels of emissions. This method is naive and flawed for the following reasons. It ignores the crucial fact that the underlying carbon emission footprint must significantly decrease to meet national obligations. For example, using the SCATTER budgeting (see below), emissions should be decreasing by over 13% per year. There is a real increase in emissions from population growth, but this is a second-order effect compared to the real reductions (a much larger quantity) implied by meeting budgets “ the first-order effect. Therefore, the SA methodology is based on minor second-order effects rather than the predominant first-order effect, and provides no reliable guidance on assessing carbon emission reductions for the SA.</p> <p>Further, it suggests that the only way the local plan can affect carbon emissions is by population growth. And that all other effects of carbon emissions will result from external effects (e.g.: national CC policy instruments).</p> <p>However, the principle underlying Section 19(1A) of the Planning and</p>	<p>emissions is flawed, it ignores the fact that emissions must significantly reduce to meet national targets.</p> <p>The SA does not provide a method for assessing the policies and so is contrary to the Act.</p> <p>Effectively the SA sets a default target of maintaining emissions as they are; and that development that does not increase population will not impact on emission. The notion that underlying emissions stay constant is not consistent with national policy. The flawed approach is reflected in the monitoring framework, with “minimise” taken as meaning no increase.</p>
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	<p>Compulsory Purchase Act 2004 is that local plans themselves must include policies designed that contribute to the mitigation of, and adaptation to, climate change. The SA provides no method to assess these policies, and it should do to be consistent with the Act.</p> <p>(D) The above SA test and SA methodology effectively set a default target for the GNLP of maintaining carbon emissions as they are. This is clear that development which did not increase the population would register a 0% increase or decrease in emissions. The notion that underlying emissions stay constant is not consistent with national policy.</p> <p>(E) This approach appears to be reflected in the Monitoring Framework, and objective GNLP16 which is:  To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data.</p> <p>This appears to be the same monitoring as under the JCS where any reduction in emissions (even a fractional percentage) is scored RAG Green.</p> <p>Minimise means no increase. This is a wholly inadequate monitoring regime in two respects:</p> <ul style="list-style-type: none"> <li>i. in the climate emergency, significant year-on-year reductions are required</li> <li>ii. no quantification is given at all</li> </ul> <p>The Sustainability Appraisal shows Climate Change objectives are not met</p> <p>21 We have indicated above that the methodology for assessing carbon emissions in the SA is not fit for purpose. However, despite this, the SA indicates in several respects that the Climate Change objectives of the plan are not met, and emission reductions are not being facilitated.</p> <p>(A) SA, page 72, Table 4.2 gives an impact matrix of all the policies</p>	<p>This monitoring framework is inadequate as the climate emergency means significant year-on-year reductions are required; and no quantification is given.</p> <p>The SA shows Climate Change objectives are not met and reduction of emissions is not facilitated. SA objectives are not met by the policies. This is not a viable way forward (specific reference made to the level of growth in rural areas).</p> <p>Statements in the SA, e.g. at Table 3.3, and policies 2,3,4 and 6, are meaningless. There needs to be a clear indication of</p>
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	<p>assessed.  Climate Change Mitigation and Adaptation and Natural Resources, Water and Contaminated Land each score the most negative scores as indicated by red squares. Air Quality and Noise score the next worse. This impacts significant environmental impacts of the plan objectives, especially for Climate Change. In a Climate Emergency this is not a viable way forward.</p> <p>(B) SA, page 53, Table 3.2 gives an impact matrix of all the sites assessed. Many sites are scored red for Climate Change. We note that the Director of Place, Norwich City Council, has commented that the level of growth in rural areas is very hard to reconcile with the climate change agenda and the need to reduce carbon emissions 4 which is reflected in the SA assessment.</p> <p>(C) SA, page 62 (part of Table 3.3) identifies adverse impacts. Under Climate Change Contribution to greenhouse gas emissions, it states under 3 bullets:</p> <ul style="list-style-type: none"> <li>i. That Policy 2 for low carbon energy generation and sustainable building design is not expected to fully mitigate this impact. The statement is meaningless as this impact is not defined properly, and what fully mitigate would mean is also not defined. The statement lacks any quantification; this is where proper budgeting, footprinting and targeting could turn a meaningless statement into something which is measurable and monitorable.</li> <li>ii. Policies 2, 3, 4 and 6 will provide a multifunctional green infrastructure network that will provide additional carbon storage or carbon sinking. This is again fine words, but totally unquantified. There is no clear indication of what is intended to be achieved, and how much carbon will be sunk, and how, and how much, it will contribute to keeping with a Paris aligned carbon budget for the area.</li> </ul> <p>The role of Green infrastructure as a carbon sink needs to be developed with details of specific methods which will produce the best outcomes in emissions reductions.</p>	<p>what is intended to be achieved.</p> <p>The role of Green infrastructure as a carbon sink needs to be developed with details of specific methods which will produce the best outcomes in emissions reductions.</p> <p>Concerned that the transport elements of the policy will not meet 2018 DEFRA Clean Growth Strategy objectives.</p> <p>Norwich City Council, has commented that the lack of ambition on transport issues and the focus on significant development in rural villages is inconsistent with the statements within the</p>
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		<p>iii. Policy 4 aims to encourage sustainable transport and a reduction in traffic related carbon emissions. They policy is not expected to meet a 30% reduction in carbon emissions from road transport by 2032, an objective under the 2018 DEFRA Clean Growth Strategy. This is of great concern. We have shown above that transport emissions in the area are at 2005 levels and rising. We look at Transport in Policy 4 in more detail below. We note that the Director of Place, Norwich City Council, has commented that the lack of ambition on transport issues and Norwich City Council, has commented that the lack of ambition on transport issues and the focus on significant development in rural villages is inconsistent with the statements within the plan on addressing climate change. Transport emissions are rising,</p>	<p>plan on addressing climate change.</p> <p>No areas of major deficiency were identified in the SA though some areas identified would potentially benefit from additional consideration (details given) e.g. more information on the HRA needed, reference made to the Cambridge Norwich Growth Corridor, SHMA Core Area and the NPA,, and consideration of reasonable alternatives; E.g. sites in Wymondham not properly considered relative to other sites.</p> <p>Monitoring – The suggested monitoring targets are very vague and there are</p>
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			<p>gaps Additional information could be included by using local/national targets, and further details on how the effects will be monitored, over what period, frequency etc would increase robustness. There is no Non-Technical Summary (NTS) within the supporting documents. This should be rectified at the Regulation 19 Consultation</p> <p>Despite the improvements suggested, the SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the GNLP as a reasonable strategy. Additional</p>
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			<p>improvements would increase its robustness.</p> <p>The potential development site Land North East of Wymondham should be selected for inclusion within any proposed site allocations within the GNLP based on its location, opportunities and performance against the SA Objectives, to aid sustainable development in this urban extension area.</p> <p>Wymondham represents a sustainable location for development. The GNLP should prioritise development along the Cambridge Norwich Growth Corridor, within the</p>
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			SHMA Core Area and the NPA.
20697 Norfolk Geodiversity Partnership	Comment	<p>Box 2.3: SA Objective 3. Biodiversity, Geodiversity and Green Infrastructure Assessment Methodologies and Assumptions</p> <p>* PAGE 27</p> <p>Geodiversity is mentioned in the title but is nowhere mentioned in the policy text. This means that the GNLP is unable to demonstrate that it is meeting sustainability measures for geological conservation, as per sections 109 and 1117 of the NPPF. This section needs rewriting to explain how geoconservation objectives are to be assessed.</p> <p>Para 1. Mentions 'ecological receptors'. Are geodiversity assets considered to be one of these? If so that needs to be made explicit, and will need a lot of explanation !</p> <p>List of Designated Sites These include County Geodiversity Sites (CGS), which have equivalent Local Sites (non-statutory) status as County Wildlife Sites.</p> <p>Para 3. &lt; Where a development proposal is coincident with, adjacent to or located in close proximity of an ecological receptor, it is assumed that negative effects associated with development will arise to some extent.&gt; How will negative effects of development proposals on geodiversity be assessed? What evidence base for sites will be used?</p>	<p>Pg 27 Explain how geoconservation objectives are to be assessed.</p> <p>Pg27 para 1: If geodiversity assets are considered to be ecological receptors it needs to be explained. Designated sites include County Geodiversity sites.</p> <p>Para 3: How will negative effects of development proposals on geodiversity be assessed? What evidence base for sites will be used?</p> <p>Page 28 – para 1: The list should include County</p>

		<p>* PAGE 28</p> <p>Para 1 &lt;Negative impacts would be expected where the following ecological designations may be harmed or lost as a result of proposals&gt; The list should include County Geodiversity Sites (CGS).</p> <p>Last para &lt; It is anticipated that the GNDP will require detailed ecological surveys and assessments to accompany future planning applications &gt; Geodiversity needs to be scoped as well as biodiversity.</p>	<p>Geodiversity Sites (CGS).</p> <p>Last para: Geodiversity needs to be scoped as well as biodiversity.</p>
21839 Natural England	Comment	<p>NE advise that further work and revision to the Local Plan's policies, Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) is required, including a review and revision of the wording for selective policies in the Draft Sites Document. We recognise that the results and recommendations of the WCS and the GIRAMS need to be assimilated into the Local Plan and supporting documents. In order to complete this work before the pre-submission stage, we would welcome working together with the GNLP authorities, and other relevant parties, to address the issues that we have raised in our consultation response. Detailed comments set out in full response in relation to SA Objectives 1, 2, 3,4,5, 8,12, 14,15; Table 3.2; Section 3 Site Assessments; Section 4 Policy Assessments; and Appendix A SA Framework.</p>	<p>Detailed comments in relation to SA Objectives 1, 2, 3,4,5, 8,12, 14,15; Table 3.2; Section 3 Site Assessments; Section 4 Policy Assessments; and Appendix A SA Framework.</p>
22239 Client Earth	Comment	<p>In respect of transport emissions, the conclusion of the Interim Sustainability Appraisal (January 2020) on the location of sites suggests that dramatic changes are required to ensure that new development has sufficient access to sustainable transport and services: Almost all of the sites would be likely to situate site end users in locations with poor transportation links and access to surrounding areas, and approximately half of the sites have been assessed as having poor pedestrian accessibility in terms of access to surrounding</p>	<p>Most sites are poorly located as regards access to sustainable transport and services.</p> <p>Meaningful guidance is not given on the</p>

	<p>pavements, footpaths and the PRow network. The majority of the sites have good access to the surrounding road network, however, due to the rural nature of many of the sites, the proposed development would be unlikely to locate site end users within a sustainable distance to a railway station or a bus stop providing regular services. (p. 72)</p> <p>4. The approach to assessing the emissions impact of individual development sites in the Interim Sustainability Appraisal also fails to give any meaningful guidance on the suitability of different sites, including in terms of their associated transport emissions. As explained on page 25 of the Interim Sustainability Appraisal, the report appears simply to assess sites by the number of inhabitants applying constant per capita emissions and then categorises the sites as having a major or minor negative impact depending on whether any assessed increase in the area's emissions falls above a 1% or 0.1% threshold respectively.</p> <p>5. The approach to assessing the overall emissions impacts of plan policies in the Interim Sustainability Appraisal is also incomplete, without adequate justification or explanation, contrary to the Strategic Environmental Assessment (SEA) regulations. Nonetheless, it indicates that some of the plan policies will not contribute sufficient emissions reductions. For example, it is stated:  Policy 2 aims to meet national carbon reduction targets by facilitating a reduction in carbon emissions through the promotion of low carbon energy generation and sustainable building design. However, these policies would not be expected to fully mitigate this impact! Policy 4 aims to encourage the integration of sustainable transport options in the design of new development and therefore contribute towards a reduction in traffic related carbon emissions. However, this policy would not be expected to fully mitigate this impact and is unlikely to facilitate significant reductions in carbon emissions, in line with objectives set under the 2018 DEFRA Clean Growth Strategy (30% reduction in carbon emissions from road transport by 2032). (p. 62)</p>	<p>suitability of different sites, including in terms of their associated transport emissions.</p> <p>The approach to assessing the overall emissions impacts of plan policies is also incomplete, without adequate justification or explanation, contrary to the Strategic Environmental Assessment (SEA) regulations.</p>
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		<p>The Sustainability Appraisal also makes the following recommendation for plan policy: Policies should seek to prioritise renewable and low carbon energy sources, opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. (p. 62)</p>	
<p>23183 Barton Willmore on behalf of Landstock Estates Ltd and Landowners Group Ltd.</p>	<p>Object</p>	<p>The full draft SA review can be found starting at p185 of the first attachment.</p> <p>Review Summary 2.4 No areas of major deficiency were identified in the SA. 2.5 The following areas of the SA would potentially benefit from additional consideration:</p> <ul style="list-style-type: none"> <li>• Existing environment (Habitats Regulations Assessment (HRA)) – A HRA has been completed for the Regulation 18 Draft Plan and should be referenced in the Regulation 18 (C) SA Report. Briefly outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the sites and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. Given the need for assessments to be coordinated, it would be helpful to have more information within the Regulation 18 (C) SA Report on the HRA undertaken for the Local Plan to date.</li> <li>• Relevant Policies, Plans and Programmes - The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA.</li> <li>• Likely significant effects on the environment (cumulative effects) – A</li> </ul>	<p>No areas of major deficiency were identified in the SA.</p> <p>A number of areas were identified for additional consideration: -More information / reference to HRA conclusions; -Relevant Policies, Plans and Programmes - does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA; -Likely significant effects on the environment (cumulative effects);</p>

	<p>definition for short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects is not provided and would be helpful for clarity. Cumulative effects are only mentioned in relation to major North East Wymondham Review of SA 21389/A5/SA March 2020 negative scores and there is no explanation of how these are considered within each topic. The approach to the assessment of cumulative effects is not well outlined and seems inconsistent between topics. SA Objectives 3 and 14 are the only Objectives that specifically mention cumulative effects in the assumptions and methodologies. In addition, there is no consideration of how each of the SA Objectives might interact with one another.</p> <ul style="list-style-type: none"> <li>• Reasonable alternatives – Additional information on the site selection process would be helpful, for example more justification where sites have been excluded or options narrowed down. This should be reflected in the iterations of the SA and would make the process more robust and transparent.</li> <li>• Reasonable alternatives – The assessment conclusions within Section 5 suggest that all sites/policies would have mixed effects with regards to sustainability and that it is not possible to identify a best performing option. The appraisal of the site in Bunwell against SA Objective 1 – Air Quality and Noise has been based on the number of new dwellings proposed (seven) and the site is awarded a negligible score. The sites within the Wymondham cluster have been awarded minor negative/major negative scores, even though some sites propose similar numbers of new dwellings (e.g. ten). It does not appear to have been taken into account within the explanatory text that the sites in Wymondham are located within close proximity to local facilities, public transport, leisure and employment opportunities, which would help to reduce the need for travel by car, thereby reducing emissions and impacts on air quality. The site in Bunwell is located approximately 5.5km away from the nearest train station (Spooner Row, which does</li> </ul>	<p>-no consideration of how each of the SA Objectives might interact with one another;</p> <p>-Reasonable alternatives – Additional information on the site selection process would be helpful, for example more justification where sites have been excluded or options narrowed down;</p> <p>-Assessment conclusions for Wymondham area.</p>
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		<p>not have frequent services compared to the larger stations in Wymondham) and approximately 7.8km away from the nearest town (Attleborough), and would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport, which would worsen impacts on air quality. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned.</p> <ul style="list-style-type: none"> <li>• Reasonable alternatives – The 2017 SA Scoping Report includes Appendix 2 ‘Demonstrating Compliance with SEA Directive’ – and states that this table will be completed and incorporated in subsequent SA reports to show how the SA has met legislative requirements. This table exercise has not been undertaken and included with the Regulation 18 (C) SA Report as set out in the Scoping Report. It would be helpful to set this out for the next Consultation.</li> <li>• Monitoring – The suggested monitoring targets are very vague and there are still some gaps to be identified. Additional information could be included by using local/national targets, and further details on how the effects will be monitored, over what period, frequency etc would increase robustness in the next Consultation.</li> <li>• Non-Technical Summary – There is no Non-Technical Summary (NTS) within the supporting documents. Whilst the GNLP is at the Regulation 18 Consultation stage, it is North East Wymondham Review of SA 21389/A5/SA March 2020 good practice to have an NTS for each revision of the SA, so that it is clear how the SA has evolved through the iterations. This should be rectified at the Regulation 19 Consultation.</li> </ul> <p>2.6 Despite the improvements suggested above, the SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the GNLP as a reasonable strategy. Section 6 of the 2018 Interim SA Report and Section 2.7 of the Regulation 18 (C) SA Report sets out the</p>	
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	<p>uncertainties and difficulties of predicting effects including assumptions made about secondary data, the accuracy of publicly available information and subjective judgement. Section 2.9 describes the assumptions made for the specific topics of the SA Objectives Assessments, which is helpful, for example where up to date ecological surveys and/or landscape and visual impact assessments have not been available and have limited the assessment of sites.</p> <p>2.7 Additional information to address the points summarised above at the Regulation 19 Consultation stage would increase further the robustness of the SA and assist in achieving the right outcome at Examination.</p> <p>4.0 Conclusion</p> <p>4.1 There are some areas of the SA which would potentially benefit from additional consideration at the Regulation 19 Consultation stage which would increase further the robustness of the SA and assist in achieving the right outcome at Examination.</p> <p>4.2 The potential development site Land North East of Wymondham should be selected for inclusion within any proposed site allocations within the GNLP based on its location, opportunities and performance against the SA Objectives, to aid sustainable development in this urban extension area. The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA, when it is clear from this review that the GNLP should focus development here.</p> <p>4.3 The twelve site assessments in the Wymondham cluster (Section B.51 within Appendix B of the Regulation 18 (C) SA Report) show that Wymondham has been robustly and fairly assessed using appropriate methodology and justifiably represents a strategic location for growth. However, it is clear that where some of the twelve Wymondham sites are awarded negative</p>	
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		<p>scores in the SA, this is due to a lack of integrated mitigation, for example standard best practice mitigation usually implemented on such sites, a lack of survey information to properly assess potential impacts or a lack of knowledge of site design/masterplan commitments. Therefore, it could be argued that these scores are not realistic. Including site assessments undertaken post mitigation would likely result in more positive sustainable scores than those awarded.</p> <p>4.4 Wymondham represents a sustainable location for development in Greater Norwich and decision making and the GNLP should prioritise development along the Cambridge Norwich Growth Corridor, within the SHMA Core Area and the NPA.</p>	
23152 Gladman Developments	Object	<p>Sustainability Appraisal</p> <p>3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plans preparation, assessing the</p> <p>(1 PPG Reference ID: 61-021-20180913</p> <p>2 PPG Reference ID: 61-001-20180913)</p> <p>effects of the GNLPs proposals on sustainable development when judged against all reasonable alternatives.</p> <p>3.2.2 The Council should ensure that the results of the SA process conducted through the Review clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision</p>	<p>The SA should be robust, justified and transparent, providing evidence and reasoning on choices made.</p> <p>The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and articulate the results</p>

		<p>not to allocate sites) when considered against all reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Councils decision making, and scoring should be robust, justified and transparent.</p> <p>3.2.3 The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives identified have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Councils position through the examination process. The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and articulate the results of any such assessment.</p>	<p>of any such assessment.</p>
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## INTERIM VIABILITY STUDY

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Viability Study, Interim Viability Study (November 2019)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
21903 Home Builders Federation	Comment	<ul style="list-style-type: none"> <li>• NPPF Para57 has greater emphasis on testing viability of development during preparation of LP with less scope for negotiation on an application by application basis.</li> <li>• Welcome acknowledgement of difference in viability based on location of development.</li> <li>• Concerned abnormal costs and their impacts, and willingness of landowners to sell land at reduced rates, hasn't been considered.</li> <li>• Though difficult to quantify, these are real costs and some assessment of their impact should be considered.</li> <li>• Policy related costs not considered e.g. electric vehicle charging points.</li> <li>• Larger sites only has CIL considered, not strategic infrastructure costs that may occur.</li> <li>• Note 10-20% uplift added to construction costs for site and infrastructure, but this would principally cover landscaping and roads not any strategic infrastructure costs.</li> </ul>	Comments under discussion with consultants

		<ul style="list-style-type: none"> <li>• Recommend inclusion of cost reflecting additional strategic infrastructure costs above CIL.</li> <li>• <i>Attached to rep is a briefing note on viability</i></li> </ul>	
23125 ClientEarth	Comment	<ul style="list-style-type: none"> <li>• Welcome statement on p62 that there is justification to set a local energy efficiency policy above 2013 Building Regulations.</li> <li>• Accompanying statement that going above 20% improvement on part L would not be viable is not supported by the Interim Viability Assessment.</li> <li>• Not clear that higher standards have been assessed within study</li> <li>• A zero-carbon standard should be starting point to work back from where viability constraints are identified</li> <li>• Identified viability constraints should only affect a dwelling category or scale of development</li> <li>• Not clear where £15,000 cost per dwelling figure for higher efficiency standards (p63 draft strategy) is derived from and what standard this relates to</li> </ul>	

<p>23189 Hopkins Homes/Persimmon Homes (Anglia) &amp; Taylor Wimpey via Bidwells</p>	<p>Comment</p>	<p>Review of Viability Study by Intali</p> <p><b>Intro</b></p> <ul style="list-style-type: none"> <li>• clients' concerns are;       <ol style="list-style-type: none"> <li>1. Level of discount for affordable housing which does not reflect bids from affordable providers</li> <li>2. BLV unrealistic</li> <li>3. single revenue rates across 3 authorities is not reflective of their individual markets.</li> <li>4. Net build costs are below market and BCIS rates</li> <li>5. No justification for 33% affordable housing</li> <li>6. No typology for schemes above 600 units. To allocate sites officers need policy requirements to be met but no typology to justify policy on large urban expansions.</li> <li>7. No additional costs arising from Part L of 2020 Building regulations</li> <li>8. Garages not covered by "Site Infrastructure" as adopted in viability study</li> </ol> </li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>• 2 key issues to address;       <ol style="list-style-type: none"> <li>1. Revenues adopted are 18/8% higher than Land Registry data of new house sales in the 3 LA's would suggest</li> <li>2. Discounts to affordable housing are inadequate and do not reflect bids made by registered providers. This is overstated by about 30%.</li> </ol> </li> <li>• Typology 9 – NPS calculates profit as 24.86% but based on Land Registry data and adopting 55% discount for affordable houses, we calculate 4.04% profit which is not a viable scenario.</li> <li>• Study is incomplete as does not include scenario above 600 units which is required in Para 005 of NPPF</li> <li>• Many other inputs used to prepare the appraisals have been amended from previous viability work and all have reduced costs of increased revenues.</li> <li>• Implies maximising contribution levels is above providing balanced, reasonable assessment that a development can be expected to deliver during plan period.</li> </ul>	
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- We have analysed sales of 600 homes using Land Registry Data in the last 14 months and the results are significantly different to reports;

Data	2	3	4	Flats
Report Min	£225,000	£295,000	£360,000	£175,000
Report Max	£255,000	£320,000	£385,000	£220,000
Report Ave	£240,000	£307,500	£372,500	£197,500
Intali Data	£201,603	£282,552	£294,493	£200,000
<b>Difference</b>	<b>19.05%</b>	<b>8.83%</b>	<b>26.49%</b>	<b>-1.25%</b>

- revenue data for viability study is referred to as “average potential sales rates” by dwelling type but no apparent research on location factors, house type or floor areas.
- Values assessed by average price across the 3 council areas and applied by number of bedrooms, then applied to dwelling sizes to provide a revenue rate/m<sup>2</sup> We have compared our findings using this method;

	NPS	Intali	% Diff
Apartment	£3,250	£2,796	16.23%
2 Bed	£3,101	£2,799	10.80%
3 Bed	£2,941	£2,545	15.58%
4 Bed	£3,024	£2,227	35.76%
	<b>£3,079</b>	<b>£2,592</b>	<b>18.80%</b>

This is a significant difference and undermines study’s conclusions

- Affordable discounts too low at 40% vs 55-60% (based on experience and conversations with various HA’s)
- Assumption in report appears based on previous viability report which provided no justification for its level and was contradictory
- Clients’ experience based on Section 106 agreements is bids on affordable rental unites around 45% of OMV and intermediate affordable are 60%OMV.
- On a recent viability with another LA we analysed the best bid received in a competitive process to be a blended 42% OMV



		<ul style="list-style-type: none"> <li>• sales rates being too high and affordable discounts being too low affects the revenues e.g three-bedroom affordable house’s revenue is £192,000 vs £138,375 using Intali estimate and 55% discount – 38.75% difference</li> <li>• Sales fees reduced from 3.5% in 2017 report to 1.75% with no justification</li> <li>• Report allows for showrooms based on assumptions which are unjustified, incomprehensible and bear no resemblance to reality on ALL sites.</li> <li>• 3% sales costs are typical in our experience to cover agents, marketing and legal costs of sale.</li> </ul> <p><b>Build Costs Inputs</b></p> <ul style="list-style-type: none"> <li>• Build costs, although reasonable, change frequently and out latest research of BCIS data shows them to be 5% higher</li> <li>• No allowance for Part L of 2020 building regulations nor homes required to M4(2)/(3) standards</li> <li>• Contingency rate lowered from 5-3% without justification – though 3% is typical in our experience</li> <li>• Infrastructure costs the same as External Works?</li> <li>• Garages included in these costs, though typically they are build costs – either way allowance should be increased to reflect construction cost</li> <li>• Our experience (garages excluded) is 10% only applies to apartment schemes, only in exceptional cases would housing schemes be below 15%.</li> <li>• No evidence to support estimate of these costs.</li> <li>• NPPF requires area-wide viability attempts to reflect all costs. 2017 Report had 7% on net build costs to allow for extra costs of brownfield land which has been removed and replaced with £50,000 or £200,000 allowances which represents a significant hidden reduction without evidence or justification</li> </ul> <p><b>Benchmark Land Value</b></p> <ul style="list-style-type: none"> <li>• (focused BLV response on agricultural land) £10,000 p/a for existing agricultural use is reasonable</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Quoted Para016 of NPPF but no data/evidence is provide nor is a summary of cross collaboration</li> <li>• No evidence to justify applied premiums as justified, nor to confirm produced figures are minimum acceptable values for landowners</li> <li>• Principle of differing levels of uplift/ premium are applied to different land types is confusing – why would a reasonable landowner accept a 10x uplift when aware another is getting 30%?</li> <li>• 2017 Hamson report assessed BLV at £348,810/acre, now reduced to £247,000/acre without reference to evidence or methodology</li> <li>• Land payment fees reduced from 1.75-1.25% without evidence or justification</li> </ul> <p><b>Typology</b></p> <ul style="list-style-type: none"> <li>• GNDP sent letters to landowners/promoters of large sites seeking written confirmation the sites are viable based on draft, unadopted policies but the viability study does not address sites above 600.</li> <li>• Study advises larger sites will have additional infrastructure costs (SUDs, Open Space, site wide infrastructure, provision of community, healthcare, educational, commercial facilities etc)but does not deal with them nor provide viability guidance for the schemes.</li> <li>• Para 005 of NPPF states the need to consider specific circumstances of strategic sites and the study fails this</li> </ul> <p><b>Appraisals</b></p> <ul style="list-style-type: none"> <li>• Typology 9 appraisal – Table 5 (p9) and Table 7 (p12&amp;13) have total %'s of 101%.</li> <li>• No rationale for 75:25 affordable rent/ intermediate split, nor 52% 2 bed units being affordable, vs 19% 4 bed units.</li> <li>• We calculate interest charges to be £506,000 less than NPS</li> <li>• Table 14a incorrectly states average area per market dwelling is 3,003m<sup>2</sup>, it should be 97.04m<sup>2</sup></li> </ul>	
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		<ul style="list-style-type: none"> <li>• Appraisal allows for 3 showrooms but should be 1 for every 50 units meaning 8 showrooms costing £200,000, not £75,000</li> <li>• Infrastructure, contingency and professional fees all over-stated as include water, access and energy. Should be net build cost only.</li> <li>• developer profit on affordable element normally calculated against total cost of providing unit rather than revenue generated – meaning profit level marginally understated.</li> <li>• With corrected showroom costs, developer profit on cost of providing affordable units, infrastructure input, contingency and external works, developer profit is reduced to 24.09%</li> <li>• Using these corrected inputs but expanding to 1,000 units the developer profit is 23.64%</li> <li>• Using Intali inputs (corrected revenue rates – see 2<sup>nd</sup> table in this rep, 55% discount to OMV for ART units) developer profit on 600 units is 4.04%</li> <li>• Applying this data to 1,000 units, developer profit is 3.84%</li> <li>• Conclude that increased development size has little impact on viability if all inputs are consistent.</li> <li>• However for larger sites the viability inputs have not been consistent as Education/Health/Community facilities, Commercial/Retail facilities and SUDS are not accounted for.</li> </ul> <p>We therefore conclude that the NPS Interim Viability Study does not provide a reliable, robust or accurate assessment of viability for the purposes of the emerging GNLP.</p>	
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