

**NORWICH AND URBAN FRINGE – SITE SUMMARIES**

**NORWICH**

<p><b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b></p>	<p>NORWICH - OVERVIEW</p>
<p><b>TOTAL NUMBER OF REPRESENTATIONS:</b></p>	<p>169 representations (covering 52 sites &amp; introduction)</p>
<p><b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b></p>	<p>GNLP (95 representations) Support: 17 Object: 40 Comment: 38</p> <p>CC (29 representations) Support: 3 Object: 9 Comment: 17</p> <p>R (39 representations) Support: 13 Object: 5 Comment: 21</p> <p>Norwich Introduction (6 representations) Support: 0 Object: 4 Comment: 2</p>

## Summary of main issues relating to Norwich City (not including urban fringe):

### GNLP sites

1. Historic England have highlighted an absence of historic context and reference to heritage assets within the wording of a number of site allocation policies. They also raise concern relating to scale, density, grain of proposed developments within the context of the historic environment.
2. Anglian Water welcome the reference to water efficient design within site allocation policies and highlight where this has not been included. In contrast to this several representations highlight that reference to this is not essential as it is covered within strategy policy & should only be included if an alternative standard is expected from a site, in which case more clarity is required relating to the bespoke requirements.
3. Environment Agency highlight the requirement for appropriate design of SuDS for developments within the proximity of a river. They also highlight instances of proposed developments on proposed allocations within flood zones 2 & 3 with recommended approaches to be taken.
4. Broads Authority seek further detail relating to developments making the most of their riverside location, clarification relating to provision of riverside walk/cycleway. They also highlight that the Affordable Housing policy wording needs strengthening in site allocation policies as it is currently ambiguous.
5. A number of objections have been received relating to further proposed development in the Yare Valley and development which would result in the loss of green space.
6. There is some objection to increased provision of student accommodation on the UEA campus.
7. Norfolk Wildlife Trust – expectation for ecological appraisal for all sites in proximity to known wildlife sites, as well as irreplaceable habitats such as ancient woodland, and priority habitats.
8. Sites should include mandatory requirement for developments to include green design features.
9. Approach to Affordable Housing is too broad – it does not fully consider site specific circumstances & viability issues.
10. Considered to be potential for increased delivery in East Norwich Regeneration sites, acknowledgement of significant infrastructure requirements.

Changes to sites advised by landowners/agents:

- **GNLP0409R** – landowner objects to single allocation for this site & does not support the proposed policy. They suggest split allocation (different to existing adopted split allocation)
- **GNLP1061** – Norwich International airport object to the policy approach to their proposed site.
- **GNLP2159** – landowner withdraws support for the proposed residential allocation of the eastern part of the site (84-120 Ber Street and Mariner's Lane Car Park) on the basis that it is no longer available for residential purposes. Land to the west (147-153 Ber Street) remains available, and the current allocation (CC2) for a minimum of 20 dwellings on this part of the site should be carried forward.
- **R10** – The site owner advises that provision of an energy plant on this site is prohibitively expensive in this location & there is no intention from them to bring this aspect of the allocation forward, as such it should be removed from the policy requirement.
- **R31** – The site owner advises that the site area available for allocation is now reduced (can now accommodate approximately 60 homes).
- **R35** – The site owner advises that this site is no longer available for allocation and wish to withdraw it from consideration.

Sites not commented on through the consultation:

Carried Forward Allocations

- Policy R29

Reasonable Alternative Sites

- GNLP0381
- GNLP0570
- GNLP3050

Unreasonable Residential Sites

- GNLP0117
- GNLP0113A
- GNLP0184
- GNLP0248 A&B
- GNLP0453
- GNLP0500
- GNLP1011
- GNLP2077
- GNLP2120
- GNLP2123

## Norwich – Preferred Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0068 Land adjacent to the River Wensum and the Premier Inn, Duke Street, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 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>
Member of public	Support	As a neighbour I support the redevelopment of this effectively scrap land. I would like to see an extension of the riverside walk through the site with a connection to St Georges St.	Support for development of Brownfield site & provision of riverside walk
Historic England	Object	This site is located within the Norwich City Centre Conservation Area. There are a number of listed buildings in the vicinity of the site including Blackfriars Bridge and 52 Colgate, both listed at grade II. Redevelopment of the site therefore has the potential to affect these heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site. We welcome the commitment in the policy to an appropriate scale and form of development in bullet point 2. However, there is no mention of the Conservation Area in the policy or supporting text and whilst bullet point 3 mentions the need to conserve and enhance adjoining heritage assets, the Conservation Area is not adjoining (the site lies within it) and other assets are not adjoining but nearby. Therefore, we suggest	Broadly supportive of principle of development  Suggested wording for heritage assets  support for riverside walk  concern relating to density and potential

		<p>amending the policy wording to read Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings (including any contribution made to their significance by setting).  We welcome the commitment to riverside access for walking and cycling in bullet point 5.  We note a desire to increase density at the site but emphasise that it is important that this must not cause a greater degree of harm on the historic environment.</p> <p>Suggested Change:  Amend the policy wording to read Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings (including any contribution made to their significance by setting).</p>	<p>impact on heritage assets</p>
<p>Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p> <p>There is also a surface water discharge point located within the boundary of the site which should be referred to as part of the site specific requirements.</p>	<p>Welcome water efficient design.</p> <p>Additional wording required in policy to refer to a surface water discharge point on boundary of site.</p>
<p>Environment Agency (Eastern Region)</p>	<p>Comment</p>	<p>We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>This site allocation lies in present day Flood Zone 2, but once climate change is added to the flood levels, the entire site lies in Flood Zone 3a High Probability. Therefore the more vulnerable residential development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual</p>	<p>SuDs need to be addressed in policy – in relation to riverside location &amp; provide improvements to habitat.</p> <p>Site located in present day flood zone 2, but climate change zone 3a – this must be</p>

		<p>probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any new built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage, which may be difficult to achieve, as the entire site is within Future Flood Zone 3a.</p> <p>However we note that there is an extant permission on the site, and that the development has been designed not to impede water flow, and allow flood storage across the ground floor levels.</p>	<p>reflected in design of development.</p> <p>Recognition of existing permission on site &amp; how this addresses flood issues.</p>
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Could it make the most of its riverside location?</li> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word 'should' seems to weaken the requirement. CC4b for example does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Bullet point 5 – so will they provide a river side path? Or maybe do it? Part of the bullet says to do it and then the other says potential future extension – suggest this is clarified. GNLP0401 equivalent bullet points implies the walkway/cycleway will be provided as part of the scheme. Is the scheme expected to provide the walkway/cycleway and to what standard?</li> </ul>	<p>Ambiguous wording to affordable housing policy.</p> <p>Clarification required relating to riverside walk wording</p> <p>Potential for enhancement to riverside location</p>



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-B Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery), Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 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>
Bidwells for UEA	Support	<p>On behalf of UEA - Strong support for preferred allocation.</p> <p>The site is entirely deliverable &amp; capable of making a significant contribution towards facilitating the UEA's forecasted student growth, and expansion of its estate, up to 2038.</p> <p>Site area should be revised to match UEA DFS (1.06ha)</p> <p>Principle of development established: Existing allocation R39 &amp; previous outline consent (now lapsed)</p> <p>Site is deliverable in accordance with NPPF definition: the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site, and is viable (detail provided in rep).</p>	<p>Site area &amp; suggested policy wording</p> <p>Historic England Historic Parkland review</p>

		<p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revision to policy wording.</p> <ul style="list-style-type: none"> <li>• Site area – revise 1.38ha to 1.06ha</li> <li>• Achievement of a <del>locally distinctive</del> high quality, low carbon, <del>energy and water and energy</del> efficient <del>exemplar</del> development of <del>exceptional quality</del> <b>which respects its historic context.</b></li> </ul>	
Member of public	Object	<p>I object to further building works in an area that was previously accessible as a thoroughfare from the southern fields to the northern fields, passing through the gardens and by the old walled gardens. These building works seem to prevent public access more and more and will lead to a disuse of the walled gardens and the old estate gardens.</p>	<p>Objection to potential loss of public access to areas disuse of the old estate/gardens.</p>
Historic England	Object	<p>Earlham Hall is listed at Grade II* with the garden walls and dovecote listed at grade II. The whole site lies within the Earlham Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings.</p> <p>We suggest that a more detailed HIA be prepared for the campus as a whole. We note bullet point 2 relating to the need to protect and enhance the significance of heritage assets including Earlham Hall and Earlham Conservation Area. It would be helpful to state that Earlham Hall is listed at Grade II* and that there are other grade II listed buildings/structures.</p> <p>Suggested Change:  Reword bullet point 2 to read Development should protect and enhance the significance of the grade II* Earlham Hall and associated Grade II listed buildings and the Earlham Conservation Area (including any contribution made to that significance by setting), through careful design, massing and appropriate open space and landscaping.</p>	<p>Insufficient reference to heritage assets &amp; mitigation/design.</p> <p>Recommend preparation of a more detailed Historic Impact Assessment (HIA)</p>

Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient exemplar development. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient exemplar development
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-C Land north of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House, University of East Anglia) Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Bidwells for UEA	Support	<p>Strong support for preferred allocation</p> <p>Principle of development established through existing allocation &amp; extant planning consent.</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. (Details/evidence contained within representation)</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revisions to policy wording:</p>	<p>suggested policy wording</p> <p>Historic England Historic Parkland review</p>

		<ul style="list-style-type: none"> <li>• Omit: "and is to provide affordable housing in accordance with policy 5, subject to viability considerations" from bold text.</li> <li>• Omit '<i>locally distinctive</i>' from bullet point 2</li> <li>• Amend final bullet point to: '<i>Access arrangements to the site will be in accordance with the approved planning permission, <u>unless otherwise agreed with the Local Planning Authority in consultation with the Local Highway Authority</u></i>'</li> </ul>	
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficiency wording in policy

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-D Land between Suffolk Walk and Bluebell Road, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 3 Object, 2 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>
Bidwells for UEA	Support	<p>Strong support for the preferred allocation, the site is entirely deliverable, and capable of making a significant contribution towards facilitating the UEA's forecasted student growth, and expansion of its estate, up to 2038.</p> <p>Part of GNLP0133-D (2.85 ha) is allocated in the Adopted Development Plan, as a strategic reserve (Policy R41), and is identified in the 2010 DFS. Policy R41 allocated the site on the basis of it only being released for development following the development of the Blackdale School site and Earlham Hall site. It should be noted that the Blackdale School site is consented, and part developed, for student accommodation. The Earlham Hall site has been under development, with the remainder of Earlham Hall identified by Area 1 of the DFS (2019). Consequently, GNLP0133-D has now been identified as a preferred allocation due to the principle of development being established by virtue of the existing Adopted</p>	<p>suggested amendments to policy wording and site area</p> <p>Historic England Historic Parkland review</p>

		<p>Development Plan allocation (R41), and the need arising, as identified within the DFS (2019).</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. (detail provided in representation)</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revision to policy wording:</p> <ul style="list-style-type: none"> <li>• Site size 3.93ha not 2.74ha</li> <li>• Omit 'locally distinctive' from bullet point 1</li> <li>• Amend bullet point 2 to read: "<i>Development should take account of its sensitive location adjoining the University Broad, protect the visual setting of the south elevations of "The Prospect" and respect the heritage significance and setting of the listed buildings within this part of the campus, balanced against having regard to Lasdun's original architectural vision which must be a material consideration in its design</i>"</li> </ul>	
Historic England	Object	<p>There are no designated heritage assets within the site boundary but the Earlham Park Conservation lies to the north of the site and the campus includes a number of listed buildings including the grade II* Sainsbury Centre and Norfolk and Suffolk Terraces, together with a number of other grade II listed buildings. Any development of this site therefore has the potential to impact upon the settings of these designated heritage assets.</p> <p>We suggest that a more detailed HIA be prepared for the campus as a whole. We welcome bullet point 2 regarding the heritage significance and setting of buildings within the campus and also the sensitive location adjacent to the</p>	<p>Amend policy wording to reference proximity to heritage assets.</p> <p>Suggested production of a detailed Historic Impact Assessment (HIA) for whole campus</p>

		<p>University Broad. Careful design will be needed of any development to ensure the protection and enhancement of nearby heritage assets.</p> <p>Suggested Change: Amend policy wording in accordance with the advice above. Prepare a more detailed HIA for the campus as a whole.</p>	Careful design will be needed of any development to ensure the protection and enhancement of nearby heritage assets.
Member of public	Object	I would like to object to the prospect of future development and expansion by the UEA on this piece of land. It is a green open space that should be preserved in its current form for the unrestricted use of the general public. Importantly, this landscape plays an important role in supporting wildlife, while it is also enjoyed daily by its countless visitors, staff and students. In fact, part of the reason for selecting the UEA for study or employment is this natural environment. Any development would lead to a degradation of this location.	<p>Loss of green open space.</p> <p>Loss of public access</p> <p>Impacts on biodiversity &amp; wellbeing</p>
Member of public	Object	<p>Object to this massive development which will destroy a large chunk of greenbelt land, including trees that contain a diversity of nesting birdlife. Losing more of the green corridor will put pressure on wildlife and the amenities the people of Norwich can enjoy in this area.</p> <p>400 student increase will also put pressure on local amenities such as Eaton Park and the Yare Valley, as well as local shops and bus services. And will also see an increase in traffic along Bluebell Road, thereby increasing carbon emissions while destroying precious woodland.</p>	<p>Loss of green open space.</p> <p>Impacts on biodiversity, climate &amp; wellbeing</p> <p>Impact on local amenities</p>
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this university related development.</p> <p>There is also no reference made to existing foul and surface water sewers being considered as part of the site layout and design in the site specific requirements.</p>	<p>Absence of reference to water efficient design</p> <p>No reference to existing drainage infrastructure &amp; how they will be addressed as part of the site</p>



			layout and design in the site specific requirements.
Member of public	Comment	<p>I am an advocate for preserving the landscape and environment of the Yare Valley. My views are endorsed by the fact that recent high river flows have seen extensive flooding of the Yare Flood Plain. This can only be further exacerbated by climate change and further development within the River Yare catchment. The conservation measures to safeguard wildlife is also imperative for this area.</p> <p>I am informed that previous permission has been given to the UEA for student accommodation within the UEA park the lakeside of the accommodation road from North Park Avenue. This requires the removal of an established belt of trees which hides the stark reality of 1960s architecture of existing UEA accommodation.</p> <p>I object to the proposal of further student accommodation proposed at this site. This is influenced by the fact that substantial student accommodation is being provided within the city centre regeneration plan. i.e. former Norwich Union office accommodation</p>	<p>Impacts of flood risk &amp; climate change</p> <p>Loss of biodiversity &amp; natural screening</p> <p>Object to further student accommodation being provided on campus due to developments in the city centre.</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-E Land at the UEA Grounds Depot Site, Bluebell Road, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	20
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 16 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>
Bidwells for UEA	Support	<p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. Detail is provided within the representation</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>The preferred allocation outlines that development on the site should provide affordable housing. However, it is sought to delete this requirement from the preferred allocation's wording. This is due to the fact that Policy 5 of the draft GNLP recognises that the development of purpose built student accommodation within the UEA Campus does not need to provide affordable housing (whereas, development outside of the UEA Campus does).</p>	<p>suggested policy wording</p> <p>Historic England Historic Parkland review</p>

		Changes suggested to policy wording relating to affordable housing contributions, landscaping and provision of disabled parking spaces.	
Yare Valley Society	Object	<p>Damaging intrusion into Yare Valley Character Area breaking its natural line, and narrowing an important green infrastructure corridor.</p> <p>Impacts adversely on the Valley Green Infrastructure Corridor ability to fulfil key roles of maintaining biodiversity, mitigating climate change, and supporting population well-being.</p> <p>Reduces a green infrastructure that needs to be increased to meet growing population demands.</p> <p>Contrary to Norwich Local Plan Policy DM6 seeking to protect the Yare Valley Character Area from building development of this kind.</p> <p>Contrary to Policies of “The Strategy” in the draft GNLP (e.g. policies 3, and 7.1) seeking to conserve and enhance the green infrastructure.</p> <p>The inclusion of the site suggests that Greater Norwich is not serious about implementing its declared green infrastructure policy.</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>
Norwich Liberal Democrats	Object	<p>The site is seen by the public as being outside of the Campus, with a footpath dividing the developed area of the campus from the non-developed area of the Yare Valley. It is a prominent and sensitive river valley location and lying at a lower level than Bluebell Road any development such as a 5 or 6 storey student accommodation block would be very visible and intrusive in the landscape if developed towards the road end of the site as the lower end towards the river would be liable to flooding. We believe it should remain in its current use as a depot and greenhouses with its relatively minor intrusion in the landscape.</p>	<p>Site is viewed as separate from UEA campus</p> <p>Development of scale would be very visible &amp; intrusive in the landscape.</p> <p>Retain current use</p>
Member of public	Object	<p>If building development were to take place on this site it would be a serious intrusion into the Yare Valley greenspace, and a threat to the integrity of the Yare Valley in the performance of its green infrastructure roles. It would further increase</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability</p>

		<p>pressure on the existing green infrastructure which is already under considerable pressure. Such development would be completely contrary to the stated aims of the Norwich Development Management Policy and the draft GNLP Strategy. It would be a clear signal to developers, and the public that Greater Norwich is not prepared to stand by its green infrastructure commitments.</p>	<p>to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>
Member of public	Object	<p>I am of the strong opinion that this site should absolutely not be used for any student accommodation development whatsoever. Several locations have in recent years been selected and built on in Norwich for this purpose.</p> <p>The closeness of the protected Yare Valley landscape means that any proposed development would be detrimental to this space, irrespective of suggested planting and biodiversity enhancements. Housing for 400(!) students will have a certain negative impact on the local ecosystem. Urban sprawl in this location should be prohibited for the sake of retaining a public open space and recreation area.</p>	<p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p> <p>Proximity to Yare Valley will have negative impacts on ecosystem.</p> <p>Urban sprawl should be prevented.</p>
Member of public	Object	<p>This proposal should be rejected on the same grounds that the adjacent GNLP0133F was rejected, that "it is likely to have significant impacts on protected green space, green infrastructure and ecological networks".</p>	<p>Site should be rejected on same grounds as</p>

		<p>Moreover, the HELAA comparison table gives the rejected GNLP0133F more 'green' and fewer 'amber' judgements than this site which currently contains a few single storey buildings well hidden behind mature trees and hedges.</p> <p>This proposal would significantly encroach on the green corridor linking the Yare valley with Bluebell Woods and Eaton Park and is contrary to the Strategy principle (para 185) "of enhancing habitats and green infrastructure".</p>	<p>adjacent unreasonable site GNLP0133F</p> <p>Proposed allocation is not supported by HELAA conclusions.</p> <p>Negative impacts on green infrastructure</p> <p>Contrary to proposed strategic policies.</p>
Member of public	Object	<p>I strenuously object to building development on this site (GNLP0133-E) as this would be a grievous intrusion into the Yare Valley green space and the existing wildlife would most certainly be compromised. Development of this space would be completely contrary to the stated aims of the Norwich Development Management Policy and the draft GNLP Strategy. Greater Norwich must be prepared to stand by its green infrastructure commitments and saying NO to this development would be a clear signal to developers.</p> <p>I am requesting that the site be withdrawn from the list of sites for development.</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>
Member of public	Object	<p>I endorse the arguments of the Yare Valley Society. As a long-term resident in the area, and ex UEA student and staff member, I support the need to preserve the</p>	<p>See Yare Valley Society</p>

		Yare Valley as an amenity providing a healthy environment for humans and wildlife. No more buildings please.	
Member of public	Object	<p>I strongly oppose on these grounds:-</p> <ol style="list-style-type: none"> <li>1. Destruction of natural habit and green spaces which is at odds with environmental protection and attempts to combat climate change</li> <li>2. Opening door to further linear development beside Bluebell Road - taking all green space</li> <li>3. Not convinced of the economic case for yet more student accommodation in Norwich - a classic boom and bust is likely which would then be too late for the amenity would be lost.</li> </ol>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p> <p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p>
Member of public	Object	<p>I wish to oppose the proposal to construct a substantial student residences building on this site. My grounds are as follows:</p> <p>(1) A very large number of student residences have recently been built or are being constructed by private developers in the City.</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining</p>

		<p>(2) Building in this location, within the Yare Valley Character Area, would further erode this valuable green corridor and in doing so would be contrary to the Norwich city development policy. The valley at this particular location is narrow and especially vulnerable.</p> <p>(3) The declared strategy in the draft GNLP states an intention to extend and enhance the green infrastructure of the area. This proposed building would have precisely the opposite effect.</p>	<p>biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p> <p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p>
Member of public	Object	I wish to object to the above plan as the Yare Valley is an area of beauty that needs to be protected for future generations and this development will seriously detract from the character of the local environment	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p>

			Green Infrastructure needs to be increased, not reduced.
Member of public	Object	<p>UEA has already caused significant damage to the Yare valley and any further building on site should be stopped.</p> <p>This proposal spreads the area of damage further south along Bluebell Road.</p> <p>The Yare Valley is already over-used in this area, with paths becoming increasingly wide, more and more buildings and the construction of concrete and tarred paths in what was once a beautiful green space. Building yet more student accommodation here will add to the already significant pressure on the river valley. It will also be visually intrusive.</p> <p>Any further reduction in green spaces in the Yare Valley Character Area will have a significant impact on its ability to function effectively in its roles of maintaining biodiversity, mitigating climate change, and supporting informal leisure. We need more, not less, green space.</p> <p>Several Policies in “The Strategy” of the draft GNLP emphasise the importance of green infrastructure, and the intention to extend and enhance it. But the inclusion of the site in the draft GNLP contradicts these stated intentions and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>
Member of public	Object	<ul style="list-style-type: none"> <li>• The Yare Valley Character Area is more than the sum of its parts. Any reduction in the Valley green infrastructure corridor impacts on its ability to function effectively in its roles of maintaining biodiversity, mitigating climate change, and supporting informal leisure.</li> <li>• The Yare Valley Character Area is already under pressure from existing leisure activity overuse (e.g. over-worn paths). In the future it will have to meet the well-being needs of an additional population from new nearby residential development</li> </ul>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp;</p>



		<p>currently under construction. Now is the time to increase the Yare Valley green space, not to reduce it.</p> <ul style="list-style-type: none"> <li>• The intrusion of building development into the Yare Valley Character Area would be contrary to existing (and continuing) Norwich Development Management Policy which seeks to safeguard the Yare Valley Character Area from building development of this kind.</li> <li>• Several of the Policies of “The Strategy” of the draft GNLP emphasize the importance of green infrastructure, and the intention to extend and enhance it. The inclusion of the site in the draft GNLP contradicts the stated intention and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</li> </ul>	<p>supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>
Member of public	Object	<p>This proposal is a direct invasion of the green corridor of the Yare Valley which has been long valued as a green infrastructure corridor, supporting informal leisure and maintaining biodiversity. This inclusion by UEA is a test of the integrity of the Council to stand by its words on green infrastructure.</p> <p>The Yare Valley is a precious resource which is being squeezed from all sides, due to inappropriate development. We should be looking to increase green space for the future wellbeing of people and the planet.</p> <p>The new housing in the area of Colney and Cringleford will put great pressure on the valley without the creeping invasion of UEA along the Bluebell lane.</p> <p>Please have the courage and integrity to tell the UEA to plant trees instead!</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p> <p>Suggest tree planting as preferable</p>

			alternative to development
Member of public	Object	The proposed site will impact negatively on the Broad, destroying wildlife habitats and causing noise and light pollution. At present the area is used extensively by local residents and students	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p>
Member of public	Object	<p>I wish to object in the strongest terms to the inclusion of this site for the development of student accommodation. The site is part of the Yare Valley, which is supposed to be protected already under the Norwich Development Management Policy, and under the GNLP policies exist to extend and enhance green infrastructure and underline its importance. This proposal is directly contrary to such policies.</p> <p>Any such development would be a major and damaging intrusion into the Yare Valley and would reduce and put further pressure onto an already limited area which currently serves to provide leisure space, biodiversity, and climate benefits in an increasingly urban area.</p> <p>Please do not approve this proposal.</p> <p>some thoughts about the impact of the development:</p> <ul style="list-style-type: none"> <li>• The Yare Valley Character Area is more than the sum of its parts. Any reduction in the Valley green infrastructure corridor impacts on its ability to function</li> </ul>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>

		<p>effectively in its roles of maintaining biodiversity, mitigating climate change, and supporting informal leisure.</p> <ul style="list-style-type: none"> <li>• The Yare Valley Character Area is already under pressure from existing leisure activity overuse (e.g. over-worn paths). In the future it will have to meet the well-being needs of an additional population from new nearby residential development currently under construction. Now is the time to increase the Yare Valley green space, not to reduce it.</li> <li>• The intrusion of building development into the Yare Valley Character Area would be contrary to existing (and continuing) Norwich Development Management Policy which seeks to safeguard the Yare Valley Character Area from building development of this kind.</li> <li>• Several of the Policies of “The Strategy” of the draft GNLP emphasize the importance of green infrastructure, and the intention to extend and enhance it. The inclusion of the site in the draft GNLP contradicts stated intentions and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</li> </ul>	
Member of public	Object	<p>First and foremost I am an advocate for preserving the landscape and environment of the Yare Valley. My views are endorsed by the fact that recent high river flows have seen extensive flooding of the Yare Flood Plain. This can only be further exacerbated by climate change and further development within the River Yare catchment. The conservation measures to safeguard wildlife is also imperative for this area.</p> <p>I object to the proposal of further student accommodation proposed at this site. This is influenced by the fact that substantial student accommodation is being provided within the city centre regeneration plan. i.e. former Norwich Union office accommodation.</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Opposition to proposed use for Student Accommodation due to number of recent</p>

			developments within the city.
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation development.</p> <p>There is also no reference made to existing surface water sewer being considered as part of the site layout and design in the site specific requirements.</p>	<p>Absence of water efficient design</p> <p>Needs to reference existing sewer provisions within site that must be addressed.</p>
Environment Agency (Eastern Region)	Comment	The very south west of the site allocation, adjacent to the Broad, is in Flood Zones 2 and 3, both now and in the future with climate change. As this is only a very small part of the site then all built development must be sequentially sited outside of the flood zones in Future Flood Zone 1.	<p>Area of site is within flood zones 2 &amp; 3.</p> <p>Development must be sequentially located to flood zone 1 area of site</p>
Historic England	Comment	Welcome bullet point 1 in relation to heritage assets.	No issues requiring investigation

Summary:

A number of representations have been submitted in objection (or strong objection) to the proposed allocation of this site. The key areas of concern raised relate to proposed development within the Yare Valley which is considered to be a damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being. Strategic policies within the plan call for improvements and increased provision of Green Infrastructure throughout the plan area, the proposed allocation of this site is considered contrary to emerging strategic policy and constitutes a reduction of space protected in the adopted development management policies.

Objection has also been raised concerning additional student accommodation in this location, it is considered that this will have detrimental impact on the amenity of existing local residents and is unnecessary following the number of recent student accommodation developments within the city centre in recent years.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0282 Land at Constitution Motors, 140-142 Constitution Hill, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Historic England	Support	Welcome bullet point 1 and reference to locally listed building.	None
Anglian Water Services Ltd.	Comment	Unlike other housing allocation policies there is no reference to water efficiency forming part of the design.	Absence of reference to water efficiency in design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0360 Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 6 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>
Member of public	Support	<p>The Deal Ground offers the opportunity for Norwich to have a vibrant gateway to the Norfolk and Suffolk Broads National Park.</p> <p>The southern rivers of the network have the potential for greater use for tourism, supporting jobs and local economies from Norwich and as far as Beccles. Broom recently ceased boat building just down the river in Brundall.</p> <p>The yacht station on Riverside road is adequate but not a particularly appealing place to be resident for one or more nights. There is opportunity for visitor moorings, properties with private moorings and commercial facilities with a focus on the boating community.</p>	Potential for boat/broads related uses, visitor and private moorings
Member of public	Object	Any development of this site will need another road connection not just Bracondale as it's already very busy. Ideally a road link should be built to the Harvey Lane traffic lights, this will provide the necessary additional road link to the site and will reduce congestion on Koblenz Avenue.	Transport related issues relating to inadequacy of existing infrastructure to

			accommodate scale of development.
Historic England	Object	<p>This large cross boundary site for 680 dwellings includes a grade II listed bottle kiln and the southern portion of the site lies within the Trowse Millgate Conservation Area. Any redevelopment of this site has the potential to affect these designated heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site.</p> <p>There is currently no reference to these designated heritages assets within the policy or supporting text. To that end, we recommend that reference is made both in the policy and the supporting text to the need to Conserve and where appropriate enhance significance of the grade II listed bottle Kiln and Trowse Millgate Conservation Area (including any contribution made to that significance by setting).</p> <p>While there may be no designated heritage assets in northern most part of the site, any tall structures have the potential to impact on longer views (especially from higher ground) in towards the historic city core (including the castle and cathedral). Although there are no designated heritage assets along this stretch of river bank, this part of the site has a significant potential for archaeology. This should be referenced in the policy</p>	<p>Reference needs to be made to heritage assets</p> <p>Concern regarding scale of development impacting heritage assets including long views</p> <p>Suggested Change: Amend policy and supporting text to reference the designated heritage assets and the need to Conserve and where appropriate enhance significance of the grade II listed bottle Kiln and Trowse Millgate Conservation Area (including any contribution made to that significance by setting)</p>
Mr David Maddox for site owner	Comment	<p>Map 9 should include all land within allocation GNLP0360. The masterplan should not be restricted to the production of supplementary planning guidance but seek a coordinated master planning process in collaboration with the Councils. GNLP0360 has the potential to deliver significantly more than 680 new homes</p>	<p>Allocation area is unclear on Map 9 &amp; should include all land</p>

		and until a masterplan has been completed policy 7.1 should refer to a minimum figure to deliver more than 2,000 new homes. The plan should allow for flexibility on the level of affordable housing to be provided in the Growth Area informed by viability testing of the masterplan and accompanied by an infrastructure funding statement.	<p>within allocation GNL0360</p> <p>This site along with the associated sites in East Norwich Regeneration area have potential to deliver a higher quantum of housing than draft policy allocates.</p> <p>Masterplan should be coordinated with the councils and be sufficiently flexible to change</p> <p>Affordable housing should be calculated on evidence based viability, not blanket 33%</p> <p>The representation includes recommended changes to policy wording</p>
Tarmac Limited	Comment	Tarmac Limited operate, and have for many years, a rail connected asphalt and aggregates transshipment operation within the heart of GNL0360 and note the	Proposed allocation / development should



		proposed development aspirations on adjoining land. Whilst it is noted that the land immediately adjoining our site is designated for Employment Use it is acknowledged that residential development is proposed to the east of the employment land. Proposals for such uses need to ensure that they will not place any constraints on the operation of our site which is recognised within the Norfolk Minerals Local Plan as a safeguarded rail depot.	not jeopardise the functioning of the existing, well established employment use on the site.
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.	Absence of water efficient design from policy.
Norfolk Wildlife Trust	Comment	<p>we recommend that specific wording is included in the allocation policies to ensure they are properly addressed at the planning application stage. Any applications in proximity to known wildlife sites (as set out in Table 4), as well as irreplaceable habitats such as ancient woodland, and priority habitats (as set out in the NERC Act 2016) should be accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure).</p> <p>GMLP0360 – this allocation partially overlaps with Carrow Abbey CWS. The ecological conditions set out in the 2013 outline planning permission (planning reference 12/00875/O) should be included in the policy wording</p> <p>We strongly recommend the inclusion of a mandatory requirement for development to include green design features such as green roofs, walls and sustainable drainage.</p>	<p>Policy wording needs to be strengthened relating to wildlife considerations.</p> <p>The ecological conditions set out in the 2013 outline planning permission (planning reference 12/00875/O) should be included in the policy wording</p>
Environment Agency (Eastern Region)	Comment	<p>Site adjacent to river – needs to ensure SuDS within the development are sufficient to protect the water quality of the River Wensum and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>The majority of the May Gurney and Deal Ground Site (GMLP0360) is within the flood plain of the River Yare, any development of the floodplain would</p>	<p>Design of SuDS appropriate to protect water quality &amp; habitat of river Wensum</p> <p>Risks of flooding requires sequential test &amp; specialist design</p>

	<p>compromise the natural functioning of the river and the WFD no deterioration objective. There should be a significant buffer between the development and the flood plain. We are working with Norwich City Council on the Yare Valley Parkway green infrastructure corridor, to ensure that the River Yare around the south of Norwich is as good as it can be and to enhance the conservation value of the nature sites along the corridor. Any sensitive development of sections of this land parcel outside of the flood plain should also restore natural habitats within the flood plain.</p> <p>As stated above, the majority of the site lies in Flood Zones 2 and 3, both now and with the addition of climate change. A significant majority of Flood Zone 3 is shown on our modelling to actually be Flood Zone 3b Functional Floodplain, with an annual probability of flooding of 5% (1 in 20) and classed as 'land where water needs to flow and be stored in times of flood'. Residential and commercial development, classed as 'more vulnerable' and 'less vulnerable' development respectively, is not permitted in Flood Zone 3b so the majority of the site will need to be left undeveloped.</p> <p>As with all development in Flood Zones, the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage.</p> <p>We note that there is an extant outline permission on the site, which met these requirements, although climate change allowances have since changed so the required floor levels may be different. This should be addressed as part of the reserved matters applications.</p>	<p>to proposed development on site. Measures proposed in approved application 12/00875/O may no longer be sufficient to address changes through revised climate change levels</p>
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Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Could it make the most of its riverside location?</li> <li>• Bullet point 1 – last part refers to not prejudice future development of or restrict options for the adjoining sites. But the Utilities site is over the river, so not adjoining. Should the policy refer to the Utilities site in this sentence as well?</li> <li>• Is the scheme expected to provide the walkway/cycleway and to what standard?</li> <li>• There appears to be no mention of protecting and enhancing designated / non-designated heritage assets. There is a listed lime kiln on the site and I think potentially some locally identified HAs.</li> </ul>	<p>Affordable housing policy wording needs strengthening/review</p> <p>Potential to enhance riverside location</p> <p>Clarification relating to development of associated sites in East Norwich Regeneration area.</p> <p>More detailed required relating to walkway/cycleway</p> <p>Absence of reference to heritage assets requires review</p>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0401 Former Eastern Electricity Headquarters, (Duke's Wharf) Duke Street, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 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>
Bidwells for Highcourt Developments Ltd	Support	<p>Support for mixed use redevelopment Site is capable of accommodating a minimum of 100 homes (or at min 250 bed student accommodation) + a range of other uses to provide a balanced mix.</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. (Further detail provided in rep.</p> <p>Previous consents have been granted on site &amp; continued pre-app discussions are underway.</p> <p>Suggested amendments to site policy:</p> <ul style="list-style-type: none"> <li>• Whilst the principle of securing a high quality design is supported, clarification is required as to what is envisaged by energy and water-efficient design. If the requirements are the same as those required by Policy 2 (Sustainable Communities) the reference should be removed in order to</li> </ul>	<p>Explanation of energy and water policy required, is it unnecessary repetition of policy 2, or is it over &amp; above? If so needs further detail.</p> <p>Greater flexibility required regarding use of existing building.</p> <p>Provision of riverside walk is unnecessary in this location. Permeability of the site is accepted.</p>

		<p>avoid duplication of policies. It is not a requirement that has been repeated in other site specific policies. If the requirements are greater than those detailed in Policy 2 (Sustainable Communities), the policy needs to make it clear that they are subject to feasibility and viability, so as to no undermine the deliverability of the site.</p> <ul style="list-style-type: none"> <li>• As per the existing site allocation (Policy 21), rather than state that any proposal should ‘seek to retain and secure the beneficial regeneration and reuse of existing riverside buildings’, the policy should state that ‘development may include either the conversion of existing buildings or redevelopment’. This approach provides flexibility and reflects the potential complexities relating to the comprehensive redevelopment of a city centre site and that the reuse of buildings may not be practical or feasible.</li> <li>• The principle of providing permeability across the site is supported. However, the requirement of a riverside walk should the existing buildings be demolished is considered unnecessary. The principle of permeability can be achieved without the provision of a riverside walk and given there is no riverside walk to the west or east of the site, the walk is considered unnecessary, given that it would cover a small area and, therefore, serve little function.</li> </ul> <p>Suggested policy wording has been included in rep.</p>	
Historic England	Object	<p>This site is located within the Norwich City Centre Conservation Area. There are a number of listed buildings in the vicinity of the site including St Gregory Church and Strangers Hall Museum, both listed at grade I, 2 Charing Cross listed a grade II* as well as numerous buildings and structures listed at grade II. Redevelopment of the site therefore has the potential to affect these heritage assets and their settings. This site benefits from Planning permission and so the principle of development has already been established on this site. Historic England is broadly supportive of the principle of redevelopment of this site and has provided advice over many years in relation to this site.</p> <p>We welcome the commitment in the policy to an appropriate scale and form of development in bullet point 1</p>	<p>Broadly supportive of principle of redevelopment of site, welcome commitment to appropriate scale &amp; form of development</p> <p>Concern regarding intention to increase density on site &amp; potential impact on heritage assets.</p>

		<p>We welcome the reference to the conservation area in bullet point 1 but suggest that a separate bullet point is included in relation to the historic environment in relation to the need to Conserve and enhance the significance of heritage assets (including any contribution made to their significance by setting) including the City Centre Conservation Area, Grade I listed St Gregory's Church and Strangers Hall Museum, grade II* listed Charing Cross and other buildings listed at grade II.</p> <p>We welcome the commitment to riverside access for walk in bullet point 4.</p> <p>We note a desire to increase density at the site but emphasise that it is important that this must not cause a greater degree of harm on the historic environment.</p> <p>Suggested Change: Suggest that a separate bullet point is included in relation to the historic environment in relation to the need to Conserve and enhance the significance of heritage assets (including any contribution made to their significance by setting) including the City Centre Conservation Area, Grade I listed St Gregory's Church and Strangers Hall Museum, grade II* listed Charing Cross and other buildings listed at grade II.</p>	<p>Welcome the commitment to riverside access for walk.</p> <p>Welcome reference to Conservation area but suggest further bullet point is added to directly address other heritage assets affected by proposed development.</p>
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Welcome reference to water efficient design</p>
Environment Agency (Eastern Region)	Comment	<p>The site lies in present day Flood Zone 2, but once climate change is added to the flood levels, the majority of the site lies in Flood Zone 3a High Probability. If possible the development should be sequentially sited on land to the south in Flood Zone 1.</p> <p>If development is required to be sited within these future Flood Zone 3 (1%cc) outlines then the more vulnerable residential development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual</p>	<p>Site is within flood zone 2 and climate change flood zone 3. Suggested outline approach required to address this.</p>

		probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any new built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to the south to provide the compensatory flood storage.	
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document?</li> <li>• Where it says 'respect its riverside location' what does that mean? Could it make the most of its riverside location?</li> <li>• Bullet point 2 – so will the development be on the existing car park?</li> <li>• Bullet point 4 implies the walkway/cycleway/ will be provided as part of the scheme – but other policies are not that clear. Is the scheme expected to provide the walkway/cycleway and to what standard?</li> </ul>	<p>Ambiguous Affordable Housing policy wording requires strengthening.</p> <p>Clarification required relating to energy and water policy wording.</p> <p>Clarification required to riverside location required.</p> <p>Clarification regarding decommissioning carpark required.</p> <p>Detail required relating to walkway/cycleway.</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0409R Land at Barrack Street/Whitefriars, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>
CODE Development Planners Ltd for Jarrod & Sons Ltd	Object	<p>Earlier representations contended that the area currently identified as GNLP0409R be included within the Greater Norwich Local Plan (GNLP) as two separate allocations with the areas shown on drawings 8436-FM-DR-2000-A00 and 8436-FM-DR2001-A00. Jarrod &amp; Sons contend that a single allocation as set out under GNLP0409R is unsound</p> <p>The undeveloped land within Jarrod &amp; Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.</p> <p>Planning permission 18/01286/F has lawfully commenced on site, it is expected to be close to completion by the time the GNLP is examined by an inspector &amp; fully complete by adoption of GNLP under current timescales.</p> <p>The approved site provides 10% affordable housing.</p>	<p>The site allocation policy is unsound, based on insufficient and out of date evidence. The amalgamation of the two allocations is inappropriate and should be reviewed in accordance with detail provided.</p> <p>Parking issues exist with unbalanced approach across plan area which</p>



	<p>Planning consent 08/00538/RM – plots F1 &amp; F2 have been agreed by Norwich City Council as lawfully commenced – therefore the permission is in perpetuity (however the sites have not progressed despite active marketing)</p> <p>Planning consent 15/01927/O has lapsed.</p> <p>Allocation needs to address market trends for car parking allowances for site to be considered desirable.</p> <p>GNLP0409R as proposed is not considered sound, and undermines the soundness of the plan.</p> <p>Affordable housing requirement unrealistic due to 10% consented on approved scheme would make development of remaining land unviable if it were expected to provide the shortfall from the 28% policy requirement. Contest that this is not an artificially subdivided site.</p> <p>No evidence that mixed use development required by policy is viable &amp; deliverable &amp; no response to why the alternatives proposed by Jarrold &amp; Sons in previous consultations/call for sites are not reasonable..</p> <p>Jarrold &amp; Son contend that due to the context of the remaining area of land available for development (i.e. the area of the proposed allocation excluding the area of Hill Residential's development) the land use is less important than the quality of development and that the remaining areas are developed.</p> <p>There are easier sites to develop for either employment or residential uses within the GNLP area, and therefore policy restrictions which specify a use or that the uses should be mixed when there is no evidence for this, renders the GNLP unsound. The GNLP0409R allocation as currently worded undermines other policies within the GNLP.</p>	<p>undermines the strategy &amp; hierarchy.</p>
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		<p>Without suitable mechanisms to support city centre development it is unlikely growth will follow the distribution set out in the settlement hierarchy as outlined in GNLP policy 1 or that the GNLP will deliver the 30.8ha of city centre employment sites as outlined in GNLP policy 6.</p> <p>Evidence suggests that there is a potential oversupply of office/employment land in the plan area. Constraints in Norwich City Centre regarding cost of land &amp; reduced car parking levels threaten desirability of this type of development within the city: <i>“to avoid being found unsound the GNLP, through a combination of carrot and stick policies, needs to ensure that high density employment uses are concentrated in locations aligned to the growth/settlement hierarchy otherwise market forces will continue to direct office development away from the city centre. The rhetoric in the currently worded GNLP does not appear to lead to allocations which reflect a greater Norwich philosophy, instead there remains strategic tension between the locations which have historically been the singular focus of each of the authorities when acting individually. Unless the GNLP addresses the conflict within its documents and evidence base it fails the tests of soundness”</i>.</p> <p>Imbalance in parking policies between Norwich &amp; Broadland: <i>“Until this imbalance is addressed through the inclusion of specific policies, the Strategy of the GNLP is unsound as there is no evidence that the Strategy will facilitate the delivery of city centre development and therefore be in compliance with Policy 7.1”</i></p> <p>Jarrold &amp; Sons contends that specific parking provisions should be included within the policy allocations for the area covered by the suggested policy allocations map (drawing 8436-FM-DR2001-A00). 180 car park spaces for the sole use of tenants of office accommodation within St James Place and Gilders Way office developments. This figure is arrived at to accommodate the 127 residual car parking spaces as part of Condition 10 15/01927/O and the 53 spaces as part of the design of area F.</p>	
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		<p>Amalgamation of previously separate allocations does not reflect the up to date position in relation to extant planning permissions and associated construction and completions. In its current form it does not satisfy the test of soundness. It has been made without sufficient or up to date evidence.</p> <p>Whilst Jarrold &amp; Sons supports the move away from the outdated allocation of CC17a and CC17b the proposed approach to assessing the site is unjustified. The evidence base does not contain details of the assessments for the reallocation potential of existing commitments to support the sites amalgamation.</p> <p>Suggested modifications to the policy wording have been provided by CODE.</p>	
Historic England	Object	<p>This site includes the grade II listed 77-79 Barrack Lane, part of the City Walls and towers which is a scheduled monument and also the western part of the site lies within the City Centre Conservation Area.</p> <p>This is the immediate setting of part of the Scheduled City wall, the grade I listed St James's Mill, the grade II listed numbers 77-79 Barrack Street and the grade I listed former church of St James. It is also in the wider setting of a number of other heritage assets including Norwich cathedral. Any development of the site has the potential to impact upon these heritage assets and their settings The site was most recently occupied by Jarrold's printing works which incorporated the 1836 textile mill and an abutting modern building which now contains the printing museum. The site has much earlier origins and stands between the river Wensum and the medieval city wall. This section of the wall ran between the tower on Silver Road to another on the waterfront. As well as River Lane, a street running immediately inside the wall, the site featured a number of elongated property boundaries stretching back from the river reflecting the value of waterfront commercial property. Within the walls was a densely built mixture of domestic and commercial property with the part of the application site outside the walls less developed with garden areas surviving through to the 20th century. In the 19th century the commercial property along the waterfront was redeveloped sometimes without heed to the medieval boundaries with more substantial building of which St James'</p>	<p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets.</p> <p>We suggest a more detailed HIA is prepared for this site. We welcome the reference to the City wall in bullet point 2 (although delete the word ancient as we would normally refer to these as scheduled monuments now). We</p>

		<p>mill is a good example. This tall, elegant building establishes a scale of development on the waterfront which other modern building adjacent has respected. At the northern side of the site the small houses of the 18th and early 19th centuries which characterised parts of Norwich before the Victorian period are represented by numbers 77-79 Barrack Street. These are remarkable survivals and reflect the scale of much of the historic building in this area. The 19th and early 20th century building on the northern side of Barrack Street is also domestic in scale while the former church of St James (the Norwich Puppet Theatre) is a relatively modest building of the 15th century with a low octagonal tower.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets.</p> <p>We suggest a more detailed HIA is prepared for this site. We welcome the reference to the City wall in bullet point 2 (although delete the word ancient as we would normally refer to these as scheduled monuments now). We suggest that you specially refer to the grade II listed 77-79 Barrack Street.</p> <p>Suggested Change: Delete ancient Refer specifically to 77-79 Barrack Street. We suggest a more detailed HIA is prepared for this site.</p>	<p>suggest that you specially refer to the grade II listed 77-79 Barrack Street.</p> <p>Suggested Change: Delete ancient Refer specifically to 77-79 Barrack Street. We suggest a more detailed HIA is prepared for this site.</p>
Anglian Water Services Ltd.	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>welcome the reference made to the achievement of a water efficient design</p>
Environment Agency (Eastern Region)	Comment	<p>The development should be sequentially sited in future Flood Zone 1 where possible.</p> <p>If development is required to be sited within these future Flood Zone 3 (1% annual probability with 35% climate change) and Flood Zone 2 (0.1% annual probability with 35% climate change) flood outlines then the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor</p>	<p>Development should be sequentially located in future Flood zone 1 where possible.</p>

		<p>levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change.</p> <p>We note that there is an extant planning permission for the site, to which we had no objection, so these requirements should have already been taken into account.</p>	<p>Advised approach to any development within areas of future flood zone 3 within the site.</p> <p>Note exiting consent which was not objected to by Environment Agency..</p>
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Could it make the most of its riverside location?</li> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document?</li> <li>• Bullet point 7 – so will they provide a river side path? Or maybe do it? Part of the bullet says to do it and then the other says potential future extension – suggest this is clarified. GNLP0401 equivalent bullet points implies the walkway/cycleway will be provided as part of the scheme. Is the scheme expected to provide the walkway/cycleway and to what standard?</li> <li>• Page 24, para 2 – so the policy refers to car free or low car usage, but the offices will have a car park; is that contradictory?</li> </ul>	<p>Ambiguous wording of Affordable Housing policy.</p> <p>Clarification of water &amp; energy efficiency policy – or is this repetition of policy 2?</p> <p>Clarification required relating to riverside setting &amp; provision of walkway/cycleway.</p> <p>Contradictory approach to car parking on site.</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0451 Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street, Norwich. (Preferred Site)
<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>
Historic England	Object	<p>The site lies within the City Centre Conservation area and there are a number of grade II listed buildings nearby. Any development of the site has the potential to impact upon these heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. This should be reflected in the policy.</p> <p>We welcome the reference to the Conservation Area and other heritage assets in bullet point 1.</p> <p>Suggested Change: We suggest including reference to significance in the policy. Include reference to scale and massing in policy.</p>	Supportive in principle subject to including reference to heritage significance in the policy. Include reference to scale and massing in policy
Anglian Water Services Ltd.	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Welcome the reference made to the achievement of a water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0506 Land at and adjoining Anglia Square, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	7
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 5 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>
Chris Watts on behalf of Columbia Threadneedle	Support	<p>Anglia Square is the most significant regeneration site in Norwich City Centre and currently the subject of a 'call-in' public inquiry for comprehensive redevelopment comprising up to 1,250 homes (including a minimum of 120 affordable homes), hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship, and associated works to the highway and public realm.</p> <p>Accordingly, we support the provisions of Policy GNLP0506 which allocates land at and adjoining Anglia Square for residential-led mixed use development as the focus for an enhanced Large District Centre and to act as a catalyst for wider investment in Norwich City Centre.</p> <p>We consider it a realistic prospect that the site will deliver in the region of 1,200 homes including a minimum of 120 affordable homes. This accounts for viability considerations and is consistent with the current proposals for Anglia Square.</p>	<p>Subject to outcome of public enquiry the site owner considers it a realistic prospect that the site will deliver in the region of 1,200 homes including a minimum of 120 affordable homes.</p> <p>This accounts for viability considerations and is consistent with the current proposals for Anglia Square.</p>

Historic England	Object	<p>Site is within Norwich City Centre Conservation area and affects the setting of numerous listed buildings. Any development of the site has potential to impact upon these heritage assets.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. However, object to the allocation as currently proposed.</p> <p>The scale of the proposed development would be inconsistent with the council's development management policies, as well as with broad strategic objectives, because it would entail development which would cause severe harm to the character of the city centre conservation area and harm to a variety of other designated heritage assets of the highest significance.</p> <p>We consider that the indicative capacity of 1200 dwellings cannot be achieved without harm to the historic environment.</p> <p>we suggest that the allocation should be based on the reinstatement of the lost historic street pattern – as envisaged by the policies in the conservation area appraisal. It should rest on an understanding of how mid- to high density development can be accommodated in a manner appropriate to the wider character and grain of the city. Elements fundamentally incompatible with this – notably the provision of c. 600 car parking spaces – should be omitted. Finally the dwelling capacity should be reduced.</p> <p>in relation to the current wording of the allocation, there is currently no mention of the Conservation Area within the policy. We suggest this be amended.</p>	<p>Concerns relating to scale and form of development, its impact (harm) locally and in a wider perception on heritage assets and the historic character of Norwich.</p> <p>suggest that the allocation should be based on the reinstatement of the lost historic street pattern – as envisaged by the policies in the conservation area appraisal. It should rest on an understanding of how mid- to high density development can be accommodated in a manner appropriate to the wider character and grain of the city</p> <p>Elements are fundamentally incompatible with this (such as 600 space car park)</p> <p>Dwelling capacity should be reduced</p> <p>Wording relating to historic environment, heritage assets including conservation area need to be included in policy.</p> <p>Lack of clarity over scale and massing of 'landmark building'</p>
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		<p>Bullet point 6 refers to a landmark building or buildings to provide a focal point for the northern city centre. We have concerns regarding this bullet and in particular the lack of clarity regarding an appropriate scale and massing of such development. We do however welcome the need for any such development to be sited to conserve and enhance heritage assets and their setting (although again we would recommend the inclusion of the word significance).</p> <p>However, it is about more than just individual heritage assets and their settings but extends to the character and skyline of the city as a whole. To that end we suggest that further work needs to be done to provide an appropriate evidence base for a tall buildings strategy for the city</p> <p>.</p>	<p>Suggested Change:  Include reference to the City Centre Conservation Area and other heritage assets in the policy. Amend policy to reduce indicative dwelling capacity, remove requirement for car parking, and ensure the reinstatement of the historic street pattern and a more appropriate density of development to reflect the grain of the area and to conserve and enhance heritage assets.  The policy will need to be reviewed following the outcome of the Planning Inquiry for this site. Undertake a tall buildings study to inform an appropriate strategy for such development within the City – see comments in Appendix A</p>
Pegasus Group for into Properties Plc	Object	<p>We do not have any objection to the principle of the regeneration of Anglia Square, rather intu wish to ensure that any future redevelopment of Anglia Square will be appropriate to its role and function as a large district centre and some wording changes to the policy for site GNLP0506 are suggested in the full representation.</p> <p>Clearly, the draft Strategy Greater Norwich Local Plan seeks to ensure that redevelopment of Anglia Square will be appropriate to the form and function of its role as a Large District Centre. The redevelopment of Anglia Square will therefore need to serve the daily needs of its existing and proposed resident populations (for example, in relation to</p>	<p>Concerns raised that Anglia Square should retain it's position as a large district centre as designated in the hierarchy, to support and not compete with city centre retail offering.</p> <p>Focus on reduced reliance of car use rather than provision of large car park.</p>

		<p>convenience shopping provision). Furthermore, its retail offer should be distinct from the primary retail functions of the City Centre and compliment rather than compete with the City Centre.</p> <p>However, the Site-Specific Allocation for Anglia Square (Policy GNLP0506) is silent on the need for the redevelopment proposals to create a form of development that is appropriate to its role and function as a large district centre.</p> <p>In order to ensure compatibility with the draft Strategy document of the Greater Norwich Local Plan, it is necessary for site specific Policy GNLP0506 to recognise the need for any scheme coming forward to complement rather than compete with the city centre in terms of trading potential, to serve the day to day convenience needs of its resident hinterland, and will be appropriate to its role and function as a large district centre (recognising its position in the local retail hierarchy).</p>	
Cathedral, Magdalen and St. Augustine's Forum (CMSA)	Object	<p>CMSA objects to the designation of the Anglia Square site for 1200 housing units. This represents an over-densification of the site, and one that fails to take account of the principally mid-rise nature of this part of the city centre, its heritage context, and the mixed use and fine grain nature of the surrounding areas, which is emerging as Norwich's creative and digital industries quarter.</p> <p>The proposed allocation is contrary to the very high level of local opposition and statutory consultee objections</p> <p>These representations, and much of the evidence presented at the call-in suggest that the quantum of residential development proposed for the hybrid development application, which we note is being proposed as the allocation of residential units for the purposes of the Greater Norwich Local Plan, was plainly too great combined with that of commercial units to be sustainable on this site.</p>	<p>1200 dwellings allocated to the site which was the subject of the Weston development to be too great a number</p> <p>This density of residential units precludes other uses such as those cultural, economic and community uses for which there is a need and local ambition, and which should be prioritised on a site that is so well served by public transport (of which there are not many across the whole of Norfolk).</p> <p>A quantum of residential dwellings considerably in excess of 1200</p>

		<p>This does not conform to the requirement to allocate ‘sustainable development’ as set out in the NPPF. The recent Heathrow decision demonstrates the Government’s resolution to deliver on sustainable development, and we suggest that if the plan incorporates this intention in this location, then it will not meet the test of sustainability.</p> <p>There are further issues of building safety attaching to high and over dense development which are highlighted by the Hackitt report and which the public enquiry on Grenfell currently underway is beginning to reveal. We do not believe that there is any reason for central Norwich to accept this level of density given that there is an ‘overhang’ of unexercised permissions across the greater Norwich area which are a hangover from the GNDP. As land supply is patently not the issue in solving Norwich’s housing needs this ill-conceived and over dense allocation should be removed from the plan.</p> <p>the now expired North City Area Action Plan should have been updated by Norwich City Council, to consider a strategic regeneration and intensification approach to the wider area.</p> <p>This would have ensured that infrastructure needs of the fully regenerated area and its catchment could have been properly considered; parking could have been solved on an area-wide basis, and an appropriately scaled set of developments at both Anglia Square and a range of sites that may come up across the area over time at the ‘gentle density’ could have been planned for, such as was recommended in the Building better, Building Beautiful report as more desirable, valuable and liveable on a long term basis. Without having undertaken technical capacity studies it is our view that the 1200 residential units allocated to Anglia Square in the draft GNLP plan is both an over-densification of tis sensitive site, and an under ambitious</p>	<p>could be achieved in the North City Area but over a wider area drawing upon a number of redevelopment sites.</p> <p>There should now be an imperative (following the representations made by many objectors during the course of the public enquiry which showed that the form of development proposed by Weston/Columbia Threadneedle will not meet local housing needs) to adopt a strategic regeneration framework to deliver housing appropriate to meeting locally defined need with units with a range of typologies designed to meet identified needs of local people.</p> <p>Additional transport issues related to Magdalen street serving the North East Growth Triangle proposals.</p>
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		<p>allocation for the wider North City Centre Area – were a coordinated area action plan to be put in place for the North City Centre area.</p> <p>we contend that this density of residential units precludes other uses such as those cultural, economic and community uses for which there is a need and local ambition, and which should be prioritised on a site that is so well served by public transport (of which there are not many across the whole of Norfolk)</p>	
Member of public	Object	<p>I object to a high rise building being built in the Anglia square area. The North of the city is a beautiful and historic area of the city with a sky line currently dominated by the spire of the cathedral. This area needs a building that will not spoil the skyline of the North of the city. Views from the Sewell Park would be spoilt and views from Mousehold. Norwich attracts a lot of visitors because it is such an attractive city. I don't want commercial forces to destroy the unspoiled nature of the city.</p>	<p>Inappropriate scale of building for location, impact on historic character of North City location and beyond</p>
Member of public	Object	<p>Proposed allocation is ill thought through &amp; will bring little benefit to the area.</p> <p>Big capital projects do not serve the needs of the population</p> <p>Health &amp; Safety concerns relating to the scale of the tower.</p> <p>Proposal will result in a large debt</p> <p>The proposal will not serve the needs of the community who currently use Anglia Square.</p> <p>Development will take a long time to complete &amp; cause traffic issues.</p>	<p>Allocation is ill thought through, there is insufficient public benefit from the proposed development</p> <p>Development will not serve the needs of the community who currently use Anglia Square</p> <p>Timescales required will cause disruption</p>
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design.</p>	<p>Absence of water efficient design in policy.</p>

### Additional points raised by CMSA relating to the wider GNLP policies

- A second critical objection to the plan is the anticipation that Magdalen Street (and other key arterial routes) which are narrow historic routes lined with heritage buildings have the capacity to accommodate the level of increased bus use to serve the growth aspiration set out in the proposed plan for the North East Growth Triangle. Magdalen Street already suffers high levels of pollution, potential structural damage to buildings and endangers pedestrians through the high level of buses using the route. The plan appears to be looking to compound this to service the movement requirements of the peripheral growth areas. This is not acceptable to us. The strategy as currently cast will see residents and businesses in the city centre carrying the cost in terms of increased pollution; harm to the built fabric; harm to the liveability and amenity of the city centre and potential harm to individuals through accident.
- It is our view that that transport strategy under-pinning the proposed level of growth for the great Norwich area needs to be urgently reviewed in the light of the requirement to deliver sustainable development as set out in the NPPF, and now backed up by the Heathrow decision. In order to sustainably unlock the high level of growth anticipated, a fundamental rethink of the movement infrastructure required to service this should take place, backed up by a revised land use/land allocation strategy to support investment in public transport and a disposition of uses and densities of new development that will enable viability and underpin an ambitious public transport proposition. This would also serve to underpin a value capture model to enable delivery.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2114 Land at and adjoining St Georges Works, Muspole Street, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>
Lanpro Services Ltd for Our Place	Support	<p>The site owner is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be deliverable and suitable for mixed use development that can come forward within the plan period to 2038.</p> <p>However, in light of potential fluctuations in market conditions and noting the lack of viability or deliverability information supporting the draft Plan, they question the justification for the quantum [of Affordable Housing] specified within draft allocation GNLP2114 and respectively request that it be reworded to ensure that it promotes and does not constrain, the scale, form, mix and timing of the site's future development.</p> <p>Suggested revision to policy wording provided in representation.</p>	<p>Affordable housing requirement is unevidenced &amp; has potential to make development unviable.</p> <p>Greater flexibility to proportion /mix of uses to aid viability &amp; deliverability.</p>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and would appear to be immediately adjacent to the grade II listed 47 and 49 Colegate and Woolpack Public House. Any development of this site has the potential to impact upon these designated heritage assets and their settings.</p>	<p>Suggested Changes: Specific mention should be made of the adjacent listed buildings. The policy</p>

		<p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. At street level, it will be important for the new development on the rest of the site to reinforce the scale, form and grain of the historic streets around.</p> <p>We welcome the reference to the Conservation Area in bullet point 2. We suggest that specific mention is also made of the adjacent listed buildings. The policy should be amended to read that preserves and enhances the significance City Centre Conservation Area and nearby designated heritage assets including 47 and 49 Colegate and the Woolpack Public House, all listed at grade II including any contribution made to that significance by setting.</p> <p>We welcome the commitment in bullet point 4 to the protection of key views of the tower of St George's Colegate.</p>	<p>should be amended to read that preserves and enhances the significance City Centre Conservation Area and nearby designated heritage assets including 47 and 49 Colegate and the Woolpack Public House, all listed at grade II including any contribution made to that significance by setting.</p>
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>No issues requiring investigation</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2159 Land at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane Car Park, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>
Bidwells for Dacre Property Holdings	Object	We wish to withdraw our support for the proposed residential allocation of the eastern part of the site (84-120 Ber Street and Mariner's Lane Car Park) on the basis that it is no longer available for residential purposes. Land to the west (147-153 Ber Street) remains available, and the current allocation (CC2) for a minimum of 20 dwellings on this part of the site should be carried forward.	Withdrawal of part of site from allocation
Historic England	Object	This site lies within the Norwich City Centre Conservation Area. There is a grade II listed building, the Remains of the Church of St Bartholomew, to the north of the site and a number of grade II listed buildings on the opposite side of Ber Street. The Grade I listed Church of St John de Sepulchre lies to the south of the site and the site forms part of the setting of this church. Any development of the site therefore has the potential to impact upon these designated heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. This should be reflected in the policy.	Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale and massing in policy.



		We welcome the reference to the Conservation area and heritage assets including the Church of St John within bullet point 1. The policy wording would be further improved by reference to significance.	
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site 2163 Friars Quay Car Park, Colegate (former Wilson's Glassworks site), Norwich. (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>
Lanpro on behalf of the landowner	Support	<p>Greater Norwich Local Plan Regulation 18 Draft Plan ref: GNLP2163 Friars Quay Car Park, Colegate</p> <p>This representation is made on behalf of the landowner of the above site to the current Regulation 18 consultation. The site has been considered by the Greater Norwich Local Plan (GNLP) as one of their preferred sites.</p> <p>The site is available, and the landowner is fully supportive of this site being allocated for the proposed development for a minimum of 25 dwellings.</p>	No issues requiring investigation
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. This site is an important one in this part of the Norwich conservation area and is in the setting of several listed buildings. It forms part of the south side of Colegate, the principle historic street of what was once the Norvic settlement and which contains numerous important historic buildings including several listed ones. A group of grade II listed buildings are situated on Colegate at the north end of the site as well as the parish church of St George (grade I listed) and the grade II* listed Bacon's House and numbers 2-9 Octagon Court. The site also lies in an interesting position in the</p>	<p>Significant heritage interest on site and in surrounding area. Suggested wording provided to strengthen the policy in this respect:</p>

	<p>conservation area where the nature of historic building changes. Modern development between Colegate and the river (Friar's Quay) is akin in scale and form to the generally low-rise, domestic scale of development on the north side of the River stretching along Colegate eastwards to Magdalen Street. The Friar's Quay development is a very successful and early example of modern residential development in an historic city which responds to the historic 'grain' of development from a time when development commonly disregarded it. To the west side of the application site is St Andrew's Street, also characterised by relatively modest, pitched roofed development, both historic (including the grade II listed numbers 22-25 and later infill matching it. This street marks the point at which the character of historic development changes. The western side of St Andrew's Street features a former 19th century factory building filling a corner plot on Colegate. This is similar in form, though smaller than the 19th century Art College building across the river to the south. Upstream from the college is modern development of a similar scale. St Andrew's Street can therefore be seen as a 'hinge' point in this part of the conservation area and the application site being to the east of it falls within the area characterised by more domestic scale development, both old and new. Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings. We consider that there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. This should be reflected in the policy. We welcome reference to the Conservation Area and heritage assets and their settings in bullet point 1 although again suggest that the wording is slightly amended to include the word significance. The site itself also formerly contained a non-conformist chapel dating from the 18th century. The impact on buried archaeology of the development will need to be given full consideration.</p> <p>Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale, grain and massing in policy. We also suggest reference to buried archaeology given the former non-conformist chapel on the site.</p>	<p>Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale, grain and massing in policy. We also suggest reference to buried archaeology given the former non-conformist chapel on the site.</p>
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<p>Anglian Water Services Ltd</p>	<p>Comment</p>	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Absence of water efficient design wording (compared to other proposed site allocation policies)</p>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2164 Land west of Eastgate House, Thorpe Road, Norwich. (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>
Lanpro on behalf of the landowners	Support	As noted in the representation the site has been subject to a planning application and approval at planning committee (ref:16/01889/O). The site is available and has been found to be suitable and appropriate for a development in the region of 20 homes through the planning process.  The landowner is fully supportive of this site being allocated for the proposed development.	No issues requiring investigation
Historic England	Support	This site lies just outside of the Thorpe Ridge Conservation Area. Any development of the site therefore has the potential to impact upon the setting of the Conservation Area. We welcome the reference to the Conservation Area in the policy.	No issues requiring investigation
Anglian Water Services Ltd.	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Absence of water efficiency policy

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3053 Land at Carrow Works, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 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>
Member of public	Support	<p>The site has not previously been promoted for redevelopment for other purposes because it was an operational industrial site. There is a pressing need for new housing in Norwich and this brownfield site is ideally situated to make a significant contribution in a sustainable location which could lead to substantial townscape and access benefits.</p> <p>The council's affordable housing policy seeks 33% provision but many housing schemes are contending that the provision of affordable housing is not viable. A scheme will need to be subject to a viability assessment.</p> <p>The site benefits from substantial heritage significance and a riverside location, there is an opportunity to create a whole new quarter around the heritage and open space assets.</p>	<p>Viability of Affordable Housing provision at 33%?</p> <p>Potential for a significant new quarter of Norwich in a sustainable location.</p>
Historic England	Object	Part of this site lies within the Bracondale Conservation Area. The site includes the Scheduled Monument, Carrow Priory and grade I listed Carrow Abbey, as well as several grade II listed buildings including Carrow House and several Carrow Works buildings. There are also a number of grade II buildings nearby on the opposite side	Suggested Changes: We suggest the inclusion of wording referencing the assets

		<p>of Bracondale. Any development of this site has the potential to affect these designated heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets.</p> <p>There is however currently no mention of these heritage assets in either the policy or supporting text. We therefore suggest the inclusion of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p> <p>We suggest that open space be provided between the Abbey and the river to reconnect the Abbey to the river and to enhance the setting of the abbey.</p> <p>This is a sensitive site in terms of the potential impact upon these multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site. In particular we question the capacity of the site.</p> <p>We suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and inform the extent of the developable area (and hence capacity of the site) and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p>	<p>and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p> <p>We suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p> <p>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g.</p>
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			showing where open space and landscaping would be located.
Fuel Properties Ltd	Comment	I am supportive of this residential led allocation and its importance in unlocking the ENSRA. It has the capacity to deliver a significant number of affordable units alongside other uses which will result in a balanced and vibrant community, however , this must be balanced with delivery which relies on commercial viability. The delivery of homes within this allocation should not be disadvantaged by a "blind 33%" affordable housing contribution without regard to other affordable housing policies particularly with regard to encouraging brownfield development, CIL contributions, social value and community benefits.	Affordable Housing provision at 33% risks disadvantaging viable development being delivered on this brownfield site?
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Absence of water efficiency policy
Environment Agency (Eastern Region)	Comment	We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and secondly any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.  GNLP3053 The vast majority of the site is Flood Zone 1. There is a very small area to the north east of the site, adjacent to the river which is Flood Zone 3 now and in the future. Therefore the sequential approach must be applied to avoid built development within this small area of flood zone to allow it to continue to provide flood storage.  The proposed bridge will need to be designed to be above the 1% flood level including 35% climate change to ensure that it does not obstruct flood flows or	Need for SuDS to protect water quality of river Wensum & take opportunities to improve riparian habitat.  Development should be sequentially located to areas of the site in Flood Zone 1  Requirements relating to proposed bridge.



		increase flood risk elsewhere. A Flood Risk Activity Permit must be obtained for the proposed bridge and any works within 8m of the main river Yare.	
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Could it make the most of its riverside location?</li> <li>• Bullet point 1 – last part refers to not prejudice future development of or restrict options for the adjoining sites. But the Utilities site is over the river, so not adjoining. Should the policy refer to the Utilities site in this sentence as well?</li> <li>• Is the scheme expected to provide the walkway/cycleway and to what standard?</li> <li>• There appears to be little mention of designated heritage assets and there are a number on site / immediately adjacent, including the scheduled and highly graded Carrow Priory, listed former industrial buildings and Carrow House on King Street and the site is within the Bracondale CA</li> </ul>	<p>Affordable housing policy &amp; wording to be reviewed</p> <p>Potential for enhancement of riverside location to be explored, including walkway/cycleway</p> <p>Wording relating to East Norwich sites/adjoining sites to be reviewed and clarified</p> <p>Conservation area and other heritage assets to be detailed in policy</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3054 The site at St Mary's Works and St Mary's House, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>
Lanpro Services Ltd for Our Place	Support	<p>The site owner Our Place, is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be a deliverable and suitable site for mixed use development that can come forward within the plan period to 2038.</p> <p>In light of potential fluctuations in market conditions and noting the lack of viability or deliverability evidence supporting the draft plan, they question the justification for the quantum specified within draft allocation GNLP 3054. They respectfully request that the wording be updated to ensure flexibility, such that it promotes and does not constrain the scale, form, mix and timing of the site's future development.</p>	<p>Flexibility of quantum of units</p> <p>Flexibility in type of residential units</p> <p>Flexibility in mix of other uses on site</p> <p>Flexible approach to heritage assets and existing building use in redevelopment.</p> <p>Justification, evidence &amp; flexibility relating to</p>

			viability to ensure a deliverable scheme.
Historic England	Object	<p>This site is located within the City Centre Conservation Area. There are a number of listed buildings nearby including St Mary's Church and St Martin at Oak Church, both listed at grade I, and Folly House and Pineapple House listed at grade II. We welcome reference to the City Centre Conservation Area listed buildings and locally listed buildings within the bullet points.</p> <p>We recognise that this site is suitable for redevelopment, but any such development must be of an appropriate design, scale and massing given the sensitivity of this location in heritage terms, between two grade I listed churches.</p> <p>To that end we suggest that we suggest that a more detailed Heritage Impact Assessment be undertaken.</p> <p>We understand that this site has planning consent which broadly established the scale of development for the site.</p> <p>Suggested Change: We suggest that a more detailed Heritage Impact Assessment be undertaken.</p>	<p>Greater emphasis of heritage assets required in policy</p> <p>Suggested detailed Heritage Impact Assessment is undertaken</p>
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	No issues requiring investigation

## Norwich – Carried Forward Allocations

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC3 10 – 14 Ber Street, Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>Site impacts a number of heritage assets &amp; their settings.</p> <p>No reference to City Centre Conservation Area or nearby listed buildings.</p> <p>there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. The scale of any new development should reflect that of the neighbouring properties</p> <p>We suggest the inclusion of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p> <p>We also suggest amending bullet point 3 with the addition of the words ‘and the scale of any new development should reflect that of the neighbouring properties.</p>	Reference to heritage assets required in policy

Anglian Water Services Ltd.	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Water efficiency wording absent from policy
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC4a Land at Rose Lane/Mountergate (Mountergate West), Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and is close to a number of listed buildings including Norwich Castle (which is also scheduled). Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings.</p> <p>The policy refers to on site listed buildings although to our knowledge there are no listed buildings actually on site (perhaps there may be some locally listed). There are however nearby listed buildings. Welcome bullet points 3 and 4.</p> <p>Suggested Change: Amend bullet point 4 unless there are actually listed buildings within the site boundary.</p>	Mistaken reference to Listed Buildings on site – HE doubt this.
Anglian Water Services Ltd.	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Water efficiency wording absent from policy

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC4b Land Mountergate/Prince of Wales Road (Mountergate East), Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>
Savills for Whitbread PLC	Support	<p>Support – subject to suggested changes:</p> <ul style="list-style-type: none"> <li>• Bullet 1, change central to western</li> <li>• Bullet 2: add C2 use class, remove ‘educational facilities’</li> <li>• Bullet 5: Baltic house in separate ownership, redevelopment would not prejudice this coming forward separately.</li> <li>• Bullet 8 relates to the retention and provision of public access to the currently private garden at the rear of Nelson Hotel. We request that this bullet point should be removed. The reason for this, is that as part of any redevelopment scheme, this open space will be re-provided, and therefore the word ‘retention’ does not work in this regard. Furthermore, any future open space would not be solely associated as a private garden to the Nelson Hotel. Finally, in respect of the provision of future open space, we consider that Bullet Point 7 covers this requirement</li> </ul> <p>Request additional bullet point added to provide for a landmark building to the site: <i>“Given the size and location of the site, it is considered that the site has potential to accommodate landmark buildings and to deliver a comprehensive high quality mixed use new community”</i></p>	<p>Review location of heritage assets &amp; amend wording as necessary</p> <p>Review use classes &amp; amend if appropriate</p> <p>Review open space &amp; amend if necessary</p> <p>Consider additional detail regarding landmark building.</p>

Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Water efficiency wording absent from policy
Historic England	Comment	Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings. We welcome bullet points 3, 4 and 5 that reflect these heritage assets.	Impact of proposed development on heritage assets addressed in policy.
Broads Authority	Comment	Could it make the most of its riverside location?	Potential for enhancement of riverside location



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC7 Hobrough Lane, King Street, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 2 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>
Historic England	Support	This site lies within the Norwich City Centre Conservation Area and includes grade II listed buildings (125-129 King Street). Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings. We welcome bullet point 3 which refers to the Conservation Area and these listed buildings and bullet point 5 in relation to heritage interpretation.	Heritage impacts highlighted
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Water efficiency wording absent from policy
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Could it make the most of its riverside location?</li> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Unlike other policies with a waterside frontage, the following wording is missing. Why is that? Could/should it be added? <ul style="list-style-type: none"> <li>o A scale and form which respects and takes advantage of its riverside context,</li> </ul> </li> </ul>	<p>Potential for enhancement of riverside setting</p> <p>Ambiguous wording of Affordable Housing policy</p>

		<ul style="list-style-type: none"><li>o High quality landscaping, planting and biodiversity enhancements particularly along the river edge;</li><li>o Protection of bankside access for maintenance purposes.</li></ul>	Missing wording/detail relating to waterside site compared to similar sites.
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC8 King Street Stores, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 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>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and is adjacent to the grade II listed Ferryboat Inn. Any development of the site therefore has the potential to impact upon the conservation area and the setting of the adjacent listed building.</p> <p>We welcome bullet points 1 and 2 that refer to heritage assets. and the need to retain the locally listed building on site. We consider that there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. We suggest that specific mention is made of the grade II listed Ferryboat Inn in the policy.</p> <p>Suggested Change: We suggest that specific mention is made of the grade II listed Ferryboat Inn in the policy. Mention should also be made in the policy of the need for appropriate massing and height on this site.</p>	<p>Support retention of locally listed building</p> <p>Concern regarding appropriate scale and grain of development</p> <p>Suggest specific mention of adjacent grade 2 listed building.</p>
Hurlingham Capital / Lanpro	Comment	<p>Comments cover 4 key points:</p> <ul style="list-style-type: none"> <li>Aspects around retention of locally listed building</li> </ul>	Concern is raised that retention of the locally listed building may not

		<ul style="list-style-type: none"> <li>• Provision of riverside walk/access to river (including tension with retaining locally listed building). Reinstatement of historic building line to King Street/Loss of trees</li> <li>• Approach to Affordable Housing</li> <li>• Policy Subtext</li> </ul>	<p>be viable over the plan period – also that retention of the building conflicts with the requirement to provide riverside walk.</p> <p>Reinstatement of the historic building line will necessitate removal of trees, this needs to be addressed in the policy.</p> <p>Policy subtext from existing adopted policy CC8 is absent from the GNLP, it is felt that this supporting text is beneficial to the policy &amp; should be carried into GNLP</p>
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Noted. This site has not been allocated for student accommodation, however water efficiency may be relevant to residential use

Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Could it make the most of its riverside location?</li> <li>• Unlike other policies with a waterside frontage, the following wording is missing. Why is that? Could/should it be added? <ul style="list-style-type: none"> <li>o A scale and form which respects and takes advantage of its riverside context,</li> <li>o High quality landscaping, planting and biodiversity enhancements particularly along the river edge;</li> <li>o Protection of bankside access for maintenance purposes.</li> </ul> </li> </ul>	<p>Potential for enhancement of riverside setting</p> <p>Ambiguous wording of Affordable Housing policy</p> <p>Missing wording/detail relating to waterside site compared to similar sites.</p>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC10 Land at Garden Street and Rouen Road, Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. Any development of the site therefore has the potential to impact upon the Conservation Area. There is currently no mention of the Conservation Area in the policy and supporting text.</p> <p>Suggested Change: We suggest the inclusion of wording referencing the Conservation Area and the need to preserve and enhance the significance of the Conservation Area</p>	Lack of reference to location within Conservation Area and the need to preserve and enhance the significance of the Conservation Area
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.	Noted. This site has not been allocated for student accommodation, however water efficiency may be relevant to residential use

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC11 Land at Argyle Street, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and adjacent to the grade II listed Remains of St Peter Southgate Church. Any development of the site therefore has the potential to impact upon the Conservation Area and listed building and their settings. There is currently no mention of the Conservation Area in the policy and supporting text. Although bullet point 1 refers to neighbouring listed and locally listed buildings, it would be helpful if the grade II listed building was referenced by name.</p> <p>Suggested Change: We suggest the inclusion of wording referencing the Conservation Area and specifically referencing the remains of St Peter Southgate church (grade II listed) and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p>	<p>Suggested inclusion of wording referencing the Conservation Area and specifically referencing the remains of St Peter Southgate church (grade II listed) and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC16 Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 2 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>
Bidwells	Support	<p>Bidwells strongly support the allocation of land adjoining Norwich City Football Club for mixed use development, including a minimum of 270 homes. The site is considered to be entirely deliverable, and capable of making a significant contribution towards the need for additional leisure, community, residential, community, retail and office uses in the Greater Norwich Area during the period to 2038.</p> <p>Whilst future connectivity with the East Norwich area is a key objective, the development of the site is not dependent on the regeneration of the wider area; a fact that should be specifically mentioned in either the policy or supporting text in order to provide certainty. Failure to do this will potentially delay the delivery of Site Reference CC16. On this basis, a few minor alterations are proposed to the policy.</p> <p>The principal change relates to the removal of the need to provide a public transport interchange on site, together with a public transport strategy for the</p>	<p>Support objective of connectivity with east Norwich, but concern regarding tying development to wider east Norwich regeneration too closely may limit development coming forward on CC16.</p> <p>Requirement for provision of public transport interchange on site could be unreasonable &amp; disproportionate.</p>



		<p>wider east Norwich strategic regeneration area. (Unnecessary &amp; may render site unviable)</p> <p>Policy proposal requiring public transport strategy for wider east Norwich strategic regeneration are – this site can be developed independently &amp; should not rely upon wider regeneration, this could be unreasonable &amp; disproportionate</p> <p>Notwithstanding the foregoing, to ensure that the development of site allocation CC16 facilitates both pedestrian and public transport accessibility to the Norwich East area, it is recognised that any proposal must demonstrate how it would facilitate future links with the adjacent site.</p>	
Historic England	Object	<p>There are no designated heritage assets within the site boundary but the Bracondale Conservation Area lies to the south west of the site. Carrow Priory (scheduled and listed also lies to the south of the site. Any development of the site therefore has the potential to impact upon the setting of the Conservation Area and the Abbey site.</p> <p>We welcome the reference to the Bracondale Conservation Area in the policy but suggest that mention is also made of Carrow Priory.</p> <p>Suggested Change: We suggest the inclusion of wording referencing Carrow Priory and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p>	<p>No reference to adjacent statutory listed building: suggest the inclusion of wording referencing Carrow Priory and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting)</p>
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Welcome inclusion of water efficient design</p>
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> </ul>	<p>Ambiguous wording to Affordable housing policy.</p>

		<ul style="list-style-type: none"> <li>• Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document?</li> <li>• Where it says ‘respect its riverside location’ what does that mean? Could it make the most of its riverside location?</li> <li>• Is the scheme expected to provide the walkway/cycleway and to what standard?</li> <li>• Reference is made to the Bracondale Conservation Area but there are Heritage Assets in the vicinity, including the schedule Boom Towers and I think listed buildings on the Carrow Works site / Papermills Yard site.</li> </ul>	<p>Clarification required regarding water and energy efficiency policy.</p> <p>Clarification of approach to riverside location and requirements relating to riverside walk.</p> <p>Provide reference to adjacent heritage assets.</p>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC18 Land at 140-154 Oak Street and 70-72 Sussex Street, Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and the grade II listed Great Hall lies to the north west of the site. Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We welcome the reference in the policy to the Conservation Area but suggest the policy should also reference the nearby grade II listed Great Hall.</p> <p>Suggested Change: We suggest the inclusion of wording referencing the grade II listed Great Hall and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p>	<p>Absence of reference to nearby statutory listed building. Suggested wording for inclusion in policy.</p>
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Welcome reference to water efficient design</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC24 Land to rear of City Hall, Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and adjacent to the grade II * listed City Hall, 13-17 St Giles Street, also listed at II* and a number of grade II listed buildings. Any development of the highly sensitive site therefore has the potential to impact upon these heritage assets and their settings. We therefore welcome bullet points 1 and 2 of the policy. The scale and height are crucial in this context. The maximum height should be the same as City Hall.</p> <p>Suggested Change: Add in reference to maximum height to be the same as City Hall.</p>	Concern relating to scale and height of proposed development – should set maximum height to the same as City Hall
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site CC30 Westwick Street Car Park, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 Comment (2 comments are both from Anglian Water – same representation submitted twice)

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. The grade II listed pump house lies to the south east of the site and the site forms part of the setting of the City Wall.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings.</p> <p>We welcome the inclusion of bullet points 1 and 4 in the policy. There are issues of scale and massing and views into the Conservation Area. These should also be highlighted in the policy.</p> <p>Suggested Change: The grade II listed pump house should also be referenced in the policy. There are issues of scale and massing and views into the Conservation Area. These should also be highlighted in the policy.</p>	Absence of reference to nearby heritage assets – suggested wording provided
Anglian Water Services Ltd. (Submitted twice)	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Welcome reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R1 Land at The Meatmarket, Hall Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design in policy

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R2 Ipswich Road Community Hub, 120 Ipswich Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
NPS Property Consultants Ltd for Norfolk County Council	Support	<p>Norfolk County Council (NCC) own the site and they remain committed to bringing this site forward for a high quality well designed development if the current NCC Adult Service user requirement ends.</p> <p>Deliverability evidence is provided in representation.</p> <p>Following the cessation of the use of the site by NCC Adult Services, the site will be developed following the grant of planning permission. It is anticipate that development will commence in the next 5 years.</p> <p>The availability of services is unlikely to result in significant costs to prevent the timely development of this site; however, the brownfield nature of the site may raise ground condition issue (and abnormal costs).</p> <p>As a result, at this stage, the landowner is committed to deliver policy complaint affordable housing (at 28%) and unless unforeseen ground condition remediation costs are identified, it is anticipated that all the requirements of policy R2 will be met.</p>	

		The detailed design will take advantage of the gateway position to deliver a distinctive design, well related to the woodland, using construction techniques to mitigate any challenges presented by ground conditions, with good pedestrian access through the site and linking to facilities locally.	
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R7 John Youngs Limited, 24 City Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Historic England	Support	Whilst there are no designated heritage assets within this site, the grade II listed Church of St Mark lies to the south of the site. Any development of the site therefore has the potential to impact upon the setting of the church. We welcome reference in bullet point 2 of the policy to the church and the locally listed residential terraces.	
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient design.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R10 Utilities site, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 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>
Firstplan for National Grid and RWE Generation UK plc	Support	<p>The Utilities Site is not only critical to the delivery of the May Gurney and Deal Ground site but also represents an opportunity to deliver much needed development and associated benefits in its own right. NG and RWE are therefore pleased that the Utilities Site continues to be carried forward as a site allocation in the Greater Norwich Local Plan (GNLP) in recognition of its role as a key catalyst to regeneration in the East Norwich Regeneration Area. These representations are therefore submitted in support of the continuing allocation and in the interest of ensuring that development density can be maximised, in accordance with national planning policy objectives.</p> <p>The Utilities Site is allocated in the Broads Authority Local Plan (2019) as Policy NOR1. The site is recognised for its potential contribution to the strategic needs of the wider Norwich area. The site is allocated for mixed-use development which could include around 120 dwellings in the Broads Authority portion of the site.</p> <p>The adopted Norwich Local Plan prescribes a minimum of 100 dwellings, whilst The Broads identifies capacity of approximately 120 dwellings. These figures</p>	<p>Important component in delivery of East Norwich Regeneration area</p> <p>Site has potential to deliver higher level of housing (at higher density) than proposed in the draft allocation.</p> <p>Affordable Housing approach requires review with more detailed site specific viability assessment.</p>

		<p>combined would result in the residential element of the scheme delivering a density of approximately 35 dwellings per hectare (dph) across the site, with a density of only 14.5 dph on the Norwich portion of the site. Assuming 35 dph across the complete site this equates to 385 dwellings, which based on all other information set out herein, seems a sensible and deliverable target. Greater capacity has been demonstrated in previous planning application by third party.</p> <p>28% affordable housing provision: There are many costs associated with delivering development at the site, having regard to the historic uses and the site constraints which, rightly, the council has already identified. On this basis, this is something that would need to be considered further, with specific regard to the viability of any proposal that should materialise.</p> <p>Also of relevance is the change in circumstances around the need for, and indeed deliverability of, the new energy plant referenced in the adopted and draft allocation. RWE has considered this in detail, however, the National Grid connection costs have been demonstrated to be prohibitively expensive in development viability terms in this location. So, whilst this reference to the site's historic 'utility' use is noted, and is not specifically resisted by the landowners, officers should be aware that this is no longer deemed possible.</p> <p>Instead, direct connections could be made to the grid as required and further discussion should take place in this regard. The upshot of this is the ability to deliver a greater number of residential units or alternative floorspace with fewer viability and space constraints.</p> <p>continue to support the reference in the draft allocation to providing an enhanced, integrated access and transportation strategy. Likewise, there is support for the continued promotion of use of the River Wensum for moorings(only) to the southern side of the utilities site, and indeed the enhanced use of the river for freight, passenger and recreational use.</p>	<p>Land owners do not consider delivery of a new energy plant on this site to be deliverable – suggest removal from policy requirements</p> <p>continue to support the reference in the draft allocation to providing an enhanced, integrated access and transportation strategy. Likewise, there is support for the continued promotion of use of the River Wensum</p> <p>The Utilities site is cleared, available, suitable and deliverable for development now, and certainly within years 0-5 of the plan, subject to the determination and implementation of suitable access arrangement.</p>
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		<p>Deal Ground's outline permission also allowed for 670 new residential units spread across the portion of land to the south of the River Wensum, including the May Gurney allocation. These combined numbers still leave a significant shortfall to the targeted 2000 minimum units for this strategic area, signifying the need to see increased deliverability elsewhere, where land is suitable and available, in the regeneration area.</p> <p>The Utilities site is cleared, available, suitable and deliverable for development now, and certainly within years 0-5 of the plan, subject to the determination and implementation of suitable access arrangement. This does rely on joint-up discussions and progression, but the landowners, and indeed potential purchasers, are keen to explore the opportunities for the site to progress alongside the plan making process to ensure that the site does not stagnate whilst others refine their approach.</p> <p>The landowners acknowledge that there are access and infrastructure matters still to be resolved throughout the East Norwich Regeneration Area, however, the draft allocation should be updated to allow sufficient flexibility for the delivery of a suited mix of uses and higher density of residential development across the Utilities Site in order to respond to changing requirements, viability constraints and suitability/availability of the site.</p>	<p>The landowners acknowledge that there are access and infrastructure matters still to be resolved throughout the East Norwich Regeneration Area, however, the draft allocation should be updated to allow sufficient flexibility for the delivery of a suited mix of uses and higher density of residential development across the Utilities Site in order to respond to changing requirements, viability constraints and suitability/availability of the site.</p>
Historic England	Support	<p>Whilst there are no designated heritage assets within the site boundary, we welcome bullet point 6 that references the heritage significance of the site.</p>	
Member of Public	Comment	<p>The development of the Utilities site is still designated, in part, for energy generation. The collapse of the proposed Generation Park project on this site demonstrates the dangers of infrastructure projects of this size, based on unproven technologies and wholly dependent on government subsidies that can be withdrawn at any time. Norwich almost ended up with an outdated, polluting and uneconomic white elephant on its eastern fringe. Any future energy producing developments should be of a manageable scale, using proven technology and be</p>	<p>Any future energy producing developments should be of a manageable scale, using proven technology and be truly green, i.e. not adding further</p>

		truly green, i.e. not adding further emissions to Norwich's already sub-standard air quality.	emissions to Norwich's already sub-standard air quality
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficient design from policy.
Broads Authority	Comment	<p>Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b for example does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</p> <p>Could it make the most of its riverside location?</p> <p>Bullet point 2 - implies the walkway/cycleway will be provided as part of the scheme – but other policies are not that clear. But then it says 'should' (which 0068 equivalent bullet point does not include) link to a future extension? This may need clarifying. Is the scheme expected to provide the walkway/cycleway and to what standard?</p>	<p>Affordable housing policy wording is ambiguous and requires strengthening</p> <p>Potential to enhance riverside location needs exploring</p> <p>Greater clarity/detail required for walkway/cycleway.</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R13 Site of former Gas Holder at Gas Hill, Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, the site lies immediately adjacent to the Thorpe Hamlet Conservation Area and close to the scheduled remains of St Leonards Priory. The site lies on rising ground, opposite Cathedral Close across the river. There are also two nearby grade II listed buildings, Bridge House PH and Chalk Hill House. The City Centre Conservation Area lies nearby.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We accept the principle of development but massing and height will be important considerations. We would expect development to blend in with the existing pattern of development. This should be included in the policy.</p> <p>We welcome the inclusion of bullet point 2 in the policy but suggest that reference should also be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.</p> <p>Suggested Change:</p>	<p>Reference should be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.</p> <p>Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.</p>

		Reference should also be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House. Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.	
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R14/R15 Land at Ketts Hill and east of Bishop Bridge Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 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>
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, the site lies immediately adjacent to the Thorpe Hamlet Conservation Area. The scheduled Blockhouse known as the Cow Tower lies to the west of the site, as does the City Centre Conservation Area.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We accept the principle of development but massing and height will be important considerations. We would expect development to blend in with the existing pattern of development. This should be included in the policy.</p> <p>We welcome the inclusion of bullet point 2 in the policy but suggest that reference should also be made to the City Centre Conservation Area and the nearby Cow Tower a scheduled monument.</p> <p>Suggested Change: Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.</p>	<p>Reference to proximity to heritage assets including City Centre Conservation Area</p> <p>Reference should be made in the policy to massing and height. Development should blend in with the existing pattern of development.</p>
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.	Reference to water efficient design



		Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	
Member of public	Comment	Development of the R14/15 site should include direct access to the open space amenity of Kett's Heights which is directly adjacent to the east of the site. This open space area is owned by the City Council and actively managed by a community volunteer group 'Friends of Kett's Heights'. At the moment the site has only one access point on Kett's Hill and there is a strong feeling in the community that a second entrance would increase the use of the site. If such an entrance were to be made from a new housing development in R14/R15 then it would almost certainly need to be stepped because of the steepness of the terrain.	Additional access to Kett's Heights

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R17 Site of former Van Dal Shoes, Dibden Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 2 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>
Historic England	Support	We welcome the reference to the locally listed shoe factory building in the policy.	
Lanpro on behalf of Van Dal Footwear Ltd.	Comment	<p>The Locally Listed status of the former shoe factory is contested (with some evidence provided to support this position) as such the requirement for retention of the existing building is also contested.</p> <p>The approach to strategic views is contested and alternative approach is suggested.</p> <p>Bullet point 2 repeats policies in the strategy are not site specific &amp; should be removed.</p> <p>The approach to affordable housing is not site specific and is not based on viability evidence.</p> <p>The density is too low for the site and should be reviewed – this point is based on pre-app discussions with Norwich City Council.</p>	<p>Heritage asset status</p> <p>Affordable housing viability</p> <p>Density of housing units</p> <p>Repetition of strategy policies that are not site specific or based on site specific evidence.</p> <p>Inappropriate policy relating to views</p>

Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R18 Site of former Start Rite Factory, 28 Mousehold Lane, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R19 Land north of Windmill Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R20 Land east of Starling Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Historic England	Support	<p>Whilst there are no designated heritage assets within the site boundary, this site lies close to the edge of the City Centre Conservation Area. Any development of the site therefore has the potential to impact upon this heritage asset and its setting.</p> <p>We therefore welcome bullet point 2 of the policy that references the Conservation Area and locally listed terraces.</p>	
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R30 Land at Holt Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Absence of reference to water efficient design.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R31 Heigham Water Treatment Works, Waterworks Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 1 Object, 0 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>
Anglian Water Services Ltd	Support	<p>Anglian Water is the land owner of Site R31: Heigham Water Treatment Works, Waterworks Road which is allocated for housing in the adopted Norwich City Site Allocations Plan. We continue to support the allocation of this site for housing as it is both available and deliverable within the plan period of the new Local Plan.</p> <p>Savills will be making a separate response in relation to the above site on behalf of Anglian Water.</p>	
Savills UK Ltd	Support	<p>The site is owned by Anglian Water and is located within the urban area of Norwich. This site is allocated in the adopted Local Plan also as site R31. This site has been carried forward and is allocated for a housing led mixed use development and open space. This site is in a sustainable location and makes use of previously developed land and therefore it should continue to be allocated in the new Local Plan.</p> <p>However, part of the site is now unavailable as Anglian Water wishes to ensure it has sufficient land for its future needs although there is no requirement in the current plan period for infrastructure investment. This means that the number of</p>	<p>Allocation site reduced in size – reduction in proposed deliverable housing</p> <p>Publicly accessible space needs to be subject to Security considerations for Waterworks – this</p>



		<p>homes that can be accommodated on the site is reduced to approximately 60 homes.</p> <p>The accompanying plan shows the remaining land that is now available and that can be developed over the plan period. We propose that the allocation is amended to this new boundary. The remaining site specific requirements are considered appropriate except for the one relating to:</p> <ul style="list-style-type: none"> <li>• The land adjoining the River Wensum will provide a public open space with a publicly accessible riverside walk. This needs to be amended due to the enhanced security requirements now needed for the water treatment site. It is proposed this criteria be amended to state: “The land adjoining the River Wensum will provide a public open space with a publicly accessible riverside walk subject to water security considerations.”</li> </ul> <p>In conclusion Anglian Water continues to support this allocation subject to the amendments suggested above.</p>	<p>needs to be acknowledged in policy</p> <p>Continued support for allocation – at a lower level.</p>
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, St Bartholomew’s Church which is as scheduled monument and listed at grade II lies to the east of the site.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings.</p> <p>There is currently no mention of the church in the policy or supporting text. We welcome bullet point 2 and also the reference to the industrial garden.</p> <p>Suggested Change: Reference should be made in the policy and supporting text to the nearby St Bartholomew’s Church (grade II listed and a scheduled monument</p>	<p>Reference should be made in the policy and supporting text to the nearby St Bartholomew’s Church (grade II listed and a scheduled monument</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R33 Site of former Earl of Leicester Public House, 238 Dereham Road, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Historic England	Support	Whilst there are no designated heritage assets on this site, the site lies adjacent to the Norwich City (Earlham Road) Cemetery which is a grade II Registered Park and Garden. Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We therefore welcome the reference in bullet point 1 to the Earlham Cemetery.	
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R35 Land at Havers Road, Norwich (Carried Forward Allocation)
<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>
Bidwells for Dacre Property Holdings	Object	<p>Dacre Property Holdings wishes to withdraw their support for the continued residential allocation of this site.</p> <p>The site has been allocated in Norwich City Council's Adopted Local Plan for housing since 2014, and to date has not been brought forward. Dacre Property Holdings, who own the majority of the site, have extensively marketed their part of the site for residential redevelopment, with limited interest expressed by housebuilders/developers. No formal offers were received, but during discussions with one potential interested party, the value indicated was significantly lower than the site's current value as a commercial/industrial site. This is largely due to the site's sub-prime location within Norwich's housing market, as well as practical issues such as the potential for land contamination from previous uses and the proximity of the site to the river with associated issues of flood risk and drainage.</p> <p>Consequently, it would not be viable to develop the site for housing at the present time, and it is difficult to see how this will change significantly in the coming years. As the site is not considered viable, and is therefore not available for residential</p>	<p>Majority land owner no longer supports allocation of this site for residential development due to lack of viability &amp; higher value in existing use.</p> <p>Suggest de-allocation</p>

		development, it does not meet the definitions of 'deliverable' or 'developable' contained in the National Planning Policy Framework (NPPF) glossary. Therefore, the housing allocation should not be taken forward in the Greater Norwich Local Plan, as it is not sound.	
Anglian Water Services Limited	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Noted

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R36 Mile Cross Depot, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Historic England	Support	Whilst there are no designated heritage assets within the site boundary the Mile Cross Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact upon this heritage asset and its setting. We therefore welcome bullet point 1 of the policy that references the Conservation Area	
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R37 The Norwich Community Hospital site, Bowthorpe Road, Norwich (Carried Forward Allocation)
<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>
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary the site lies adjacent to the Norwich City (Earlham Road) Cemetery which is a grade II Registered Park and Garden as well as the Jewish Mortuary Chapel listed at Grade II.</p> <p>Any development of the site therefore has the potential to impact upon these heritage assets and their settings.</p> <p>We welcome the reference to Earlham Cemetery in bullet point 2. It would be helpful if the policy also reference the fact that the cemetery was a grade II Registered Park and Garden and also referred to the nearby Jewish Mortuary Chapel.</p> <p>Suggested Change: It would be helpful if the policy also reference the fact that the cemetery was a grade II Registered Park and Garden and also referred to the nearby Jewish Mortuary Chapel.</p>	It would be helpful if the policy also reference the fact that the cemetery was a grade II Registered Park and Garden and also referred to the nearby Jewish Mortuary Chapel.
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design.	Reference to water efficient design

		Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R38 Three Score, Bowthorpe, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Historic England	Support	Whilst there are no designated heritage assets within the site boundary the site lies immediately adjacent to the Bowthorpe Conservation Area and within the setting of Bowthorpe Hall (grade II listed). Any development of the site therefore has the potential to impact upon these heritage assets and their settings. We therefore welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.	
Anglian Water Services	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	No reference to water efficient design



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site R42 Land west of Bluebell Road, and north of Daisy Hill Court/Coral Court, Westfield View, Norwich (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>
Historic England	Support	We welcome the reference to the Eaton Conservation Area in bullet point 1.	
Member of Public	Support	Reluctantly I accept the need for extending the current development on this site given the fact that facilities have already been established there.	
Anglian Water Services Ltd	Comment	We welcome the reference made to the achievement of a water efficient design.  Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Reference to water efficient design

## Norwich – Reasonable Alternative Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0377 Land east of King Street (King Street Stores & Sports Hall site), Norwich (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Environment Agency (Eastern Region)	Comment	<p>The very east of the site allocation, adjacent to the river, lies in the present and future Flood Zones 2 and 3. Therefore there should be no development within this small section of flood zones, and the development should be sequentially sited in Flood Zone 1.</p> <p>As with all development in Flood Zones, the development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage.</p>	Site partially within flood zones 2 & 3, any development should be located within flood zone 1 area. Design to address flooding issues

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2137 Land at Riverside, Norwich (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 2 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>
Environment Agency (Eastern Region)	Comment	<p>We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and secondly any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>This site allocation lies mainly in Flood Zone 1 currently, with very small areas of Flood Zones 2 and 3 adjacent to the river. Once climate change is applied to the flood outlines, Flood Zones 2 and 3 extend further into the site. The development must be sequentially sited in future Flood Zone 1 where possible. If development is required to be sited within these future Flood Zone 3 (1% annual probability with 35% climate change) and Flood Zone 2 (0.1% annual probability with 35% climate change) flood outlines then the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood</p>	<p>SuDS design to protect water quality &amp; riparian habitat.</p> <p>Any development of the site should be sequentially located in flood zone 1 where possible. If development is required in flood zones 2 and 3 – basic guidance is provided.</p> <p>The requirement to take account of the future flood risk on the site, and design</p>

		<p>storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change.</p> <p>The requirement to take account of the future flood risk on the site, and design the development to be safe and not increase flood risk elsewhere, as required in the NPPF, should be mentioned within the site allocation.</p>	<p>the development to be safe and not increase flood risk elsewhere, as required in the NPPF, should be mentioned within the site allocation.</p>
Broads Authority	Comment	I note this is a reasonable alternative. If this is taken forward then we would welcome wording that covers the issues addressed above.	

**Norwich – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-F UEA – Land west of Bluebell Road, Norwich (Unreasonable Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Member of public	Support	I strongly wish to see preserved the current amenity this site represents, free of development.	Strong Support for 'unreasonable' assessment of site to be retained without development

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0523 Dowding Road, Norwich (Unreasonable Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Councillor Karen Vincent	Comment	I note site GNLP0523 is currently deemed unreasonable for development. Should this decision change and the site be considered a reasonable site for development, I would urge that a requirement be included for the development to undertake off-site upgrades to Taylor's Lane to bring this up to Highways Adoptable standard. It is very likely Taylor's Lane would form part of the development's Access and Design statement to integrate new residents with the community to provide access to schools and community facilities in Old Catton. Taylor's Lane is an unmade road and is unsuitable in its current state to do this.	Improvements required to Taylors Lane should this current 'unreasonable' site be reconsidered for allocation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1061 Imperial Park (formerly site 4), Norwich Airport (Partly within Broadland – Horsham St Faith Parish), Norwich (Unreasonable Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 support, 1 object, 0 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>
GP Planning Ltd	Support	<p>The promoters of HNF2 strongly SUPPORTS the Council's stance that this is an unreasonable site for general employment uses. The site has extant planning permission for aviation uses. The site is a strategic site within the airport area and should be retained for such airport related uses.</p> <p>Changes in the aviation sector assume greater use of regional airports and the demand for airport related uses is likely to increase concurrently. A change to general employment is not supported as that would place additional pressure on other sites allocated for general employment.</p>	<p>Support for the 'unreasonable' stance for the proposed site</p> <p>Expectation that need for aviation uses will increase following changes in aviation sector relating to regional airports.</p> <p>General employment use would place additional pressure on other sites allocated for such.</p>

<p>Barton Willmore for Norwich International Airport</p>	<p>Object</p>	<p>To support the previous representations in March 2018, Norwich Airport provided evidence in a Local Market Analysis Report, undertaken by Roche and Bidwells, that demonstrated the Site’s potential to include large-scale B2 and B8 uses for which there is a proven demand and lack of comparable space in the region. Its size gives the Site the flexibility to support a wide range of economic sectors.</p> <p>The site can contribute to the region’s large-scale development. It can support a number of uses, including large-scale B2 and B8 employment space.</p> <p>Norwich Airport proposes an allocation at the Site of a mixture of aviation and nonaviation uses, with the flexibility to release land for general employment depending on market demand. Part of the Site benefits from extant planning consent restricted to aviation-related uses. The lack of market demand has meant that there has been no uptake in aviation floorspace. This has been the case since the original planning permission for aviation-related uses was granted by NCC and BDC in 2013. The planning flexibility to include non-aviation related employment floorspace will help bring the Site into economic use and contribute towards the provision of infrastructure required to support aviation-related employment, which is considered a knowledge-intensive sector by the GNLP.</p> <p>Policy 1 has allocated 360ha of employment land to aid the delivery of 33,000 additional jobs. It highlights the strategic locations for employment use, shown in Figure 1 below. It adds that the total amount of allocated and permitted employment land in 2018 is broadly enough to provide for expected and promoted growth.</p> <p>Norwich Airport would question the assertion that the land provided for in 2018 is sufficient for the region’s needs throughout the Plan period. The Report undertaken by Bidwells and Roche has demonstrated that the existing employment floorspace is not of a high quality to support new businesses, shown at Appendix 2. New companies require flexibility and the Site is able to provide suitable floorspace that is beneficial from a quantitative (it would be the largest single allocation in the</p>	<p>The proposed allocation should:</p> <ol style="list-style-type: none"> <li>1. Be extended to 46.5 ha in total make efficient use of previously developed land, in accordance with national planning policy;</li> <li>2. Include roadside and leisure uses (Use Classes A1-A5, sui generis, C1 and D2) given its situation adjacent to the region’s strategic highway network and to improve the sustainability of the remainder of the Site for future employees (both aviation and non-aviation); and</li> <li>3. Allow for a greater proportion of non-aviation floorspace to come forward in the event that the aviation floorspace</li> </ol>
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	<p>Plan) and qualitative (it would provide modern floorspace, adapting to companies' requirements and market changes) perspective.</p> <p>Incorrect site area:  Norwich Airport supports inclusion of the allocated land for employment in Policy 6 and that 50% is allocated for general employment uses. However, the proposed allocation does not include all of the land proposed for Site 4 that was submitted as part of the previous Regulation 18 representations, which extends to 46.5ha. The proposed allocation does not include available land to the west and east. It is requested that this land is included in the draft allocation. Paragraph 117 of the National Planning Policy Framework (NPPF) states that planning policies should promote an effective use of land, utilising previously developed land. Airport land is defined as previously developed land by the NPPF and therefore all the land should be made available and be allocated for employment uses.</p> <p>The Norwich Airport Masterplan, which has been adopted by NCC and BDC, does not identify the Site for any future airport operational or expansion requirements, with the exception of retaining the required fire training facilities. Paragraph 9.34 of the Masterplan states that it will safeguard 44% of the land (equivalent to 20.5ha out of the total 46.5ha) for aviation-related uses to maximise the opportunity for large-scale aviation-related development. Chapter 9 of the Airport Masterplan is shown at Appendix 3. This percentage was agreed between the Airport and NCC. This statement should be reflected in the GNLP since the Airport Masterplan has been adopted by NCC and BDC.</p> <p>In addition to providing large-scale industrial space for aviation and non-aviation uses, the Site's direct access onto Broadland Northway (A1270) makes it suitable for the provision of roadside and leisure uses (Use Classes A1-A5 / sui generis / C1 / D2). The allocation of retail uses will help to improve the sustainability of the Site as a whole by providing services and facilities for future employees in both aviation and nonaviation industries, reducing the need to make vehicular trips.</p>	<p>is not realised in the next 5-10 years.</p>
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		Norwich Airport considers that the Policy should include a time limit, which seeks to reduce the amount of aviation-related employment floorspace over time, reflecting market conditions. The allocation should be worded to allow for a greater proportion of non-aviation floorspace should the proposed aviation occupier not be realised in the next 5-10 years. This flexibility is supported by paragraph 81 (d) of the NPPF	
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## COLNEY STRATEGIC EMPLOYMENT/ BAWBURGH RECREATION

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	COLNEY OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	15
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	4 Support,5 Object, 6 Comment

Colney/ Bawburgh has 2 Preferred Options, 3 Carried forward allocations, No Reasonable Alternatives, 8 Unreasonable Sites (4 residential and 4 employment)

### **Policy COL1 - Land adjacent to Norwich Research Park (NRP), Colney - (Carried Forward Allocation)**

Representations: 2, (0 Support, 1 Object, 1 Comment)

#### Main Issues

Historic England suggest that the policy be amended to include reference to the heritage assets and the need to conserve and where appropriate enhance them

Anglian Water No reference to water efficiency forming part of design unlike other allocation policies

## **Policy COL2 / GNLP0140-C - Land rear/east of Institute of Food Research (IFR), Colney - (Carried Forward Allocation)**

Representation: 3 Comments (1 Support, 1 Object, 1 Comment)

### Main Issues

UEA Estates & Buildings /Bidwells – Supports the site and it can be demonstrated it is viable and deliverable.

Environment Agency (Eastern Region) - Comment - It appears that the site boundary has been drawn to exclude the current and future flood zones just to the east of the site, and therefore the sequential approach has been correctly applied.

Historic England- Object Suggest that the policy be amended to include reference to the heritage assets and the need to conserve and where appropriate enhance them including Earlham Conservation Area and associated listed buildings.

## **Policy BAW2 Bawburgh and Colney Lakes (Carried Forward Allocation)**

Representations 7 (2 Support, 2 Object, 3 Comment)

### Main Issues:

Norfolk Wildlife Trust Comment Ecological concerns, specific wording needs to be included in the allocation policies to ensure they are properly addressed at the planning application stage.

Yare Valley Society - Support The rapid increase in population in the vicinity of the Yare Valley due to residential development has created an urgent need for additional recreational green space on the Valley to relieve pressure on the existing green space.

Historic England / Yare Valley Society - the map state "carried forward retail/commercial development". This would appear to contradict the heading which states the allocation is for a water-based country park. This should emphasise allocation for green space and leisure.

Individuals: Support the creation of a country park in this location and unreservedly welcome the conservation management plan.

Anglian Water – Comment No reference to water efficiency forming part of design unlike other allocation policies

Glavenhill/ Lampro Object – BAW2 is not effective as it is privately owned, currently let to a third party, no public access to the site is not achievable and it is not available to offset the impacts of housing growth. In the absence of evidence to the contrary the BAW2 allocation is unsound and should be removed from the emerging Local Plan. However, their proposal (GNLP0294 ) is deliverable.

**Site GNLP0514 - Old Watton Road, Colney - (Unreasonable Residential Site)**

Representations: 2 (0 Support, 1 Object, 1 Comment)

Main Issues:

Individual / Agent: Comment The assessment of site GNLP0514 does not seem specific to the site, has general principles applied that are incorrect.

**Site GNLP0253 – Colney Hall, Watton Road, Colney - (Unreasonable Residential Site)**

Representations: 1 (1 Object, 0 Comment, 0 Support)

Main Issues:

Agent: object This offers a unique opportunity to live independently while benefitting from on- site research presence.

Sites not commented on through the consultation:

Preferred Sites

- GNLP0331R – B
- GNLP0331 – C

Carried Forward Allocations

- Policy COL3

Unreasonable Residential Sites

- GNLP0158
- GNLP0592

Unreasonable Non-Residential Sites

- GNLP0140 – A
- GNLP0140 – B
- GNLP0331R – A
- GNLP0244

## Colney/Bawburgh – Carried Forward Allocations

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy COL1 Land adjacent to Norwich Research Park (NRP), Colney (Carried Forward Allocation)
<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>
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	Object	Suggested Change: We suggest that the policy be amended to include reference to the heritage assets and the need to conserve and where appropriate enhance them Suggested wording: Development should conserve or where appropriate enhance the significance of nearby heritage assets including Old Hall and its wall, and the Rectory (noting that significance may be harmed by development within the setting of an asset) through appropriate landscaping, density and design.	<ul style="list-style-type: none"> <li>Review Policy wording</li> </ul>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy COL2 / GNLP0140-C Land rear/east of Institute of Food Research (IFR), Colney (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>
UEA Estates & Buildings [11339] Bidwells (Mr. Harry Ramsey) [16862]	Support	It has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the plan period. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for development, and the UEA support the GNLP's proposals to allocate the site for B1(b) Science Park development, hospital expansion and other proposals ancillary and complementary to these uses.	
Environment Agency (Eastern Region) (Mr Liam Robson, Planning Advisor (lead officer)) [18780]	Comment	It appears that the site boundary has been drawn to exclude the current and future flood zones just to the east of the site, and therefore the sequential approach has been correctly applied.	
Historic England (Mrs Debbie	Object	Suggested Change: We suggest that the policy be amended to include reference to the	Consider Policy Amendment



Mack, Historic Environment Planning Adviser) [19652]		heritage assets and the need to conserve and where appropriate enhance them Suggested wording: Development should conserve or where appropriate enhance the significance of nearby heritage assets including Earlham Conservation Area and associated listed buildings (noting that significance may be harmed by development within the setting of an asset) through appropriate landscaping, density and design.	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy BAW2 Bawburgh and Colney Lakes (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	7
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 2 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>
Yare Valley Society (Mr John Elbro, Chair) [14909]	Support	<p>The rapid increase in population in the vicinity of the Yare Valley due to residential development at Bowthorpe, Cringleford, Little Melton and elsewhere has created an urgent need for additional recreational green space on the Valley to relieve pressure on the existing green space (many well-worn paths one indicator of over use).</p> <p>A Country Park at Bawburgh Lakes should be given high priority. In the interim a policy should be put in place for an extension of the Yare Valley Walk and for managing the site's habitats.</p>	
Member of the public	Support	<p>Strongly support the creation of a country park in this location and unreservedly welcome the conservation management plan. It highlights the importance of this location's environment and biodiversity whilst also providing some public access in the form of footpaths and cycle routes. The provision of more open green spaces are called for in view of the new residential developments in Bowthorpe and Cringleford, for</p>	

		example. In addition, the proposed country park could help to reduce the pressure from informal recreation in the Yare Valley.	
Norfolk Wildlife Trust (Mr Mike Jones) [17875]	Comment	<p>Ecological concerns, specific wording needs to be included in the allocation policies to ensure they are properly addressed at the planning application stage. Any applications in proximity to known wildlife sites (as set out in Table 4), as well as irreplaceable habitats such as ancient woodland, and priority habitats (as set out in the NERC Act 2016) should be accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure).</p> <p>BAW2 the inclusion of this site, on the Bawburgh/Colney Pits CWS is dependent on the guarantee that it is only as green infrastructure, and not as retail/ commercial land as described in the draft plan. Any proposals for the site would need to ensure that the ecological value of the CWS is retained and enhanced if they are to be made open to the public.</p>	<ul style="list-style-type: none"> <li>Review policy wording</li> </ul>
Yare Valley Society (Mr John Elbro, Chair) [14909]	Comment	<p>The words beneath the map state "carried forward retail/commercial development". This would appear to contradict the heading which states the allocation is for a water-based country park.</p> <p>The Yare Valley Society would expect the words under the map to emphasise allocation for green space and leisure activities.</p> <p>The words on the map should be changed to reflect the intention to develop the site as a water-based country park.</p>	<ul style="list-style-type: none"> <li>Correct Map legend</li> </ul>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	Consistent policy approach to water efficiency needed.

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]</p>	<p>Object</p>	<p>We note that this site is allocated for a water based country park and yet on the Colney Inset Map on page 2 the key shows this area as a retail/commercial allocation. Suggested Change: Amend key to show as a recreational allocation</p>	<ul style="list-style-type: none"> <li>• Correct Map legend – Colney Chapter page. 15</li> </ul>
<p>Glavenhill Lanpro</p>	<p>Object</p>	<p>Our proposal (GNLP0294 ) proposes open space and tree planting which is fully costed and will be delivered to offset the impacts of planned housing growth on the network of Natura 2000 sites including The Broads National Park. For this reason, my client also objects to emerging allocation BAW2 relating to Bawburgh and Colney Lakes as it is not effective as it is privately owned, currently let to a third party, no public access to the site is achievable and it is not available to offset the impacts of housing growth. In the absence of evidence to the contrary the BAW2 allocation is unsound and should be removed from the emerging Local Plan.</p>	

## Colney/Bawburgh – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0514 Old Watton Road, Colney (Unreasonable Residential Site)
<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>
Individual / Agent 21296	Comment	The assessment of site GNLP0514 does not seem specific to the site, has general principles applied that are incorrect. As a site situated as part of an existing settlement, with new homes being build 100 meters further up Old Watton Road, opposite the Spire Hospital, very close to the Research Park and Norfolk and Norwich Hospital, parish church, UEA, safe route to local school, etc and a road network that links to A47 and City Centre with access to public transport. This is a sustainable location.	
Member of the public	Object	Site should be reassessed. Unfairly classified as unreasonable. It is a reasonable site being sustainable - proximity to two hospitals, adjacent to surrounding housing, local employment at the research park or City centre through public transport with no negative impacts on a very good local road network. Assessment 14 categories 9 green and 5 amber what's wrong with the site	

		Site GNLP0514 should be the preferred site in the absence of any choice of alternative suitable sites. It also will help with the requirement of at least 10% smaller sites in the National Planning Policy Framework."	
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0253 – Colney Hall, Watton Road, Colney (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Feng Li (Agent) on behalf of owner (22111)	Object	<ul style="list-style-type: none"> <li>This offers a unique opportunity to live independently while benefitting from the latest health and social care research Unique opportunity to integrate research and delivery: The on-site research presence will provide direct access to the Colney community who will in turn benefit from unparalleled research outcomes and access to global leading academics and professionals.</li> </ul>	<ul style="list-style-type: none"> <li>Consider additional supporting evidence</li> </ul>

## COSTESSEY

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	COSTESSEY OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	11
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 5 Object, 4 Comment

Costessey has 0 Preferred Options, 3 Carried forward allocations , 3 Reasonable alternatives,12 Unreasonable sites (11 residential 1, non-residential)

### **Policy COS3 – Site GNLPSL2008 - Longwater Employment Area, Costessey - (Carried Forward Allocation)**

Representations 1 (0 Support, 0 Object, 1 Comment)

#### Main Issues:

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.



**Policy COS5- Site GNLP2074 - Royal Norfolk Showground, Costessey - (Carried Forward Allocation)**

Representation 1 (1 Support, 0 Object, 0 Comment)

Main Issues:

Mr Michael Haslam (Agent) Support We support policy COS5/GNLP2074 subject to the inclusion of the words in the policy and revisions as set out in the notes underneath the policy.

**Site GNLP0581- Land of Bawburgh Lane and New Road - (Reasonable Alternative Site - Contingency for 1000 dwellings (along with GNLP2143) if required)**

Representations: 4 (1 Support, 1 Object, 2 Comments)

Main Issues:

Gladman Developments - Support - If allocated, the development would deliver significant benefits to the local area and wider community.

Carter Jonas LLP- Object Concerns whether this strategic extension would provide policy compliant levels of affordable housing considering the costs of providing primary infrastructure in advance of development.

Members of the public Comment Dereham Road overloaded with cars, need for cycle routes to city, easy bus access, no direct access of New Road. Bawburgh village is already a rat run.

**Site GNLP2043 - North of New Road, east of A47 - (Reasonable Alternative Site – Contingency for 1000 dwellings (along with GNLP0581) if required)**

Representations 3 (0 Support, 2 Object, 1 Comment)

Main Issues:

Individual Comment Bawburgh village is already a rat run, with excessive speed, water runoff will need to be diverted from the site rather than soaking into the fields.

Carter Jonas LLP Object The delivery of this site is reliant on the larger site (0508) for access arrangements and could not come forward separately.

**Site GNLP0284R Townhouse Road, Costessey - (Unreasonable Residential Site)**

Representations 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Carter Jonas LLP Object The site with different development options as opposed to their sites (GNLP0581 and GNLP2043) which could meet the requirements for a contingency site to meet non-delivery at the commitments and allocations elsewhere.

**Site GNLP2138 North of Gunton Lane, Costessey (Unreasonable Residential Site)**

Representations 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

GP Planning Ltd Object The landowner of the site OBJECTS to it being considered unreasonable. The reasoned justification relates to its location in flood zones and its ecological interest.

Sites not commented on through the consultation:

Carried Forward Allocation:

- Policy COS4

Reasonable Alternative Site:

- GNLP0593

Unreasonable Residential Sites

- GNLP0039
- GNLP0206
- GNLP0238
- GNLP0243
- GNLP0266
- GNLP0468
- GNLP0489
- GNLP2004
- GNLP2156

Unreasonable Non-residential Site

- GNLP0376

## Costessey - Carried Forward Allocations

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy COS3 – Site GNLPSL2008 Longwater Employment Area, Costessey (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	<ul style="list-style-type: none"> <li>Consistent policy approach to water efficiency needed</li> </ul>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy COS5- Site GNLP2074 Royal Norfolk Showground, Costessey (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Individual - Mr Michael Haslam (Agent) [15391]	Support	We support policy COS5/GNLP2074 subject to the inclusion of the words in the policy and revisions as set out in the notes underneath the policy.	

## Costessey – Reasonable Alternative Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0581 Land of Bawburgh Lane and New Road (Reasonable Alternative Site - Contingency for 1000 dwellings (along with GNLP2143) if required)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 2 Comments

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Members of the public	Comment	Dereham Road overloaded with cars, need for cycle routes to city, easy bus access, no direct access of New Road. Bawburgh village is already a rat run, with excessive speed, water runoff will need to be diverted from the site rather than soaking into the fields.	
Carter Jonas LLP (Mr Richard Seamark, Partner) [14157]	Object	Concerns whether this strategic extension would provide policy compliant levels of affordable housing taking into account the costs of providing primary infrastructure in advance of development. This together with constraints identified does not equate to reasonable alternative. It is requested that this site is deleted as a reasonable alternative housing allocation.	

<p>Gladman Developments (Mr Craig Barnes, Planning Manager) [19643]</p>	<p>Support</p>	<p>If allocated, the development would deliver significant benefits to the local area and wider community, including: 600+ dwellings, providing for a wide range of tenure, size and types of new homes; 33% affordable homes; Child Play provision; Access links to the southern land parcel; pedestrian and cycling links/improvements; Recreational green open space; , A net-biodiversity gain; Support existing local services through increased use and spend.</p>	<ul style="list-style-type: none"> <li>• Consider additional supporting documents</li> </ul>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2043 North of New Road, east of A47 (Reasonable Alternative Site – Contingency for 1000 dwellings (along with GNLP0581) if required)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 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>
Individual	Comment	Bawburgh village is already a rat run, with excessive speed, water runoff will need to be diverted from the site rather than soaking into the fields.	
Carter Jonas LLP (Mr Richard Seamark, Partner) [14157]	Object	The delivery of this site is reliant on the larger site (0508) for access arrangements and could not come forward separately. The constraints to development are similar to those that exist for the larger therefore, the site is also not available as a contingency to meet non-delivery of housing at commitments and allocations. Therefore, it is requested that this site is deleted as a reasonable alternative housing allocation.	Consider additional supporting documents for this site.
Individual	Object	Concerned how development here could incorporate bus and cycle travel as the main form of travel for residents. This would make the development car dependent, which is not consistent with the Climate Emergency declarations of the City Council.	Further investigations with Highway Authority to this regard.



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0284R Townhouse Road, Costessey (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Carter Jonas LLP (Mr Richard Seamark, Partner) [14157]	Object	The site with different development options for the site i.e. 100, 130 and 200 dwellings is smaller than the proposed strategic extension sites (GNLP0581 and GNLP2043) and as such it could meet the requirements for a contingency site to meet non-delivery at the commitments and allocations elsewhere. A number of technical reports have been submitted for further consideration.	Consider additional documentation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2138 North of Gunton Lane, Costessey (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
GP Planning Ltd (GP Planning Maureen Darrie, Director) [14933]	Object	The landowner of the site OBJECTS to it being considered unreasonable. The reasoned justification relates to its location in flood zones and its ecological interest. There is sufficient land outside the flood zone that could be developed without impacting on flood risk. The remaining land could be preserved and enhanced for biodiversity.	

## CRINGLEFORD INCLUDING EMPLOYMENT LAND AT KESWICK

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	CRINGLEFORD INCLUDING EMPLOYMENT LAND AT KESWICK OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	17
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	5 Support, 3 Object, 9 Comment

Cringleford (including employment land at Keswick) has 0 Preferred Sites, 2 Carried Forward/Uplift Allocations, 0 Reasonable Alternative Sites, 1 Unreasonable Site.

### **Policy HOU1 – GNLP0307 /GNLP0327 Land north and south of the A11, Cringleford - (Carried Forward Allocation and Uplift)**

Responses: 10 (1 Support, 2 Object, 7 Comments)

#### Main Issues:

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Environment Agency Comment The site GNLP0307 is adjacent to a stream with a significant section of culverted watercourse (1.2 km in total). We would support opening up this stream again as well as any contribution towards enhancing the natural habitats of the Yare Valley.

Highways England Comment It is likely that the proposed improvement of the A47 Thickthorn Interchange will be able to accommodate the proposed 360 dwelling uplift. However, this view should be confirmed with a transport assessment.

Barratt David Wilson Homes /Pegasus Planning Group Comment BDW's interest relates to the part of the preferred allocation identified as GNLP0307, which had previously promoted through the GNLP process for additional housing. The remainder of site GNLP0307 has the capacity to accommodate a greater number of dwellings than the uplift. Also object to assessment and HELAA.

Cringleford Parish Council Support Generally supportive of the plan for the Parish, and the uplift within the settlement boundary. Furthermore, it is grateful for the continued recognition of some sensitive sites that have been designated unreasonable.

Historic England Support Whilst there are no designated heritage assets within the site boundary, a grade II listed Round House lies to the south east of the site. However, it would appear that there is an existing commitment between the proposed site and the Round House and so there will be no additional harm to that already permitted.

### **Policy KES2 – Site GNLP0497 Land west of Ipswich Road, Keswick (Carried Forward Employment Allocation)**

Representations 5 (1 Support, 2 Object, 2 Comment)

#### Main Issues:

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Norfolk Wildlife Trust Comment Specific ecological concerns regarding allocations. KES2 this site is adjacent to Harford Bridge Marshes CWS and NWT Nature Reserve. Run-off from the development onto the CWS may be an issue and will need to be mitigated for.

Norwich Apex Limited / Lanpro Services Ltd Support On behalf of Norwich Apex Limited (owners of Apex Business Park). Norwich Apex secured planning permission for Apex Business Park in 2018 from South Norfolk Council (2017/2794) and are currently assembling the required infrastructure for the site (including the access, link road and strategic landscaping).

Keswick and Intwood Parish Council Object No further approval should be granted until various impacts potentially identified are ruled out.

Historic England Object Whilst there are no designated heritage assets within the site boundary, the grade II listed church of all Saints and remains of the Church of All Saints lies to the west of the site. Any development has the potential to impact upon the

setting of these designated heritage assets. There is currently no mention of these assets within the policy or of the need to conserve and where appropriate enhance the significance of these nearby heritage assets. Suggested policy wording included.

**Site GNLP0461 Land off Gurney Lane, Cringleford (Unreasonable Residential Site)**

Representations 1 (1 Support, 0 Object, 0 Comment)

Main issues:

Cringleford Parish Council Support      Generally supportive of the plan for the Parish, and the uplift within the settlement boundary. Furthermore, it is grateful for the continued recognition of some sensitive sites that have been designated unreasonable

**Site GNLP3047 A140/Mulbarton Road, Keswick (Unreasonable Non-Residential Site)**

Representations: 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Lanpro Services Ltd Object      The site is in a sustainable location and represents an important employment opportunity that should be included in the GNLP.

Sites not commented on through the consultation:

- None

**Cringleford (including employment land at Keswick)– Carried Forward Allocation/Uplift**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HOU1 – GNLP0307 /GNLP0327 Land north and south of the A11, Cringleford (Carried Forward Allocation and Uplift)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	10
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 7 Comments

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	<ul style="list-style-type: none"> <li>Consistent policy approach to water efficiency needed.</li> </ul>
Environment Agency (Eastern Region) (Mr Liam Robson, Planning Advisor (lead officer)) [18780]	Comment	The site GNLP0307 is adjacent to a stream with a significant section of culverted watercourse (1.2 km in total). We would support opening up this stream again as well as any contribution towards enhancing the natural habitats of the Yare Valley.	<ul style="list-style-type: none"> <li>Consider Policy wording</li> </ul>

Highways England (Mr Eric Cooper, LP Contact) [12879]	Comment	It is likely that the proposed improvement of the A47 Thickthorn Interchange will be able to accommodate the proposed 360 dwelling uplift. However, this view should be confirmed with a transport assessment	<ul style="list-style-type: none"> <li>• Confirm additional evidence base is submitted</li> </ul>
Barratt David Wilson Homes [15660] Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	Comment	BDW's interest relates to the part of the preferred allocation identified as GNLP0307, which BDW has previously promoted through the GNLP process for additional housing. In response to the proposed uplift BDW has carried out additional work to support the further development of their site. This work also demonstrates <u>that the remainder of site GNLP0307</u> has the capacity to accommodate a greater number of dwellings than the uplift of 360 homes that are proposed across the balance of site GNLP0307 and site GNLP0327.	<ul style="list-style-type: none"> <li>• Consider as part of further Site assessment</li> </ul>
Barratt David Wilson Homes [15660] Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	Comment	Response to HELAA assessment with regards to constrains identified and reference to additional supporting documents to demonstrate how these can be successfully mitigated in order to deliver additional housing numbers.	<ul style="list-style-type: none"> <li>• Consider additional evidence submitted</li> </ul>
Barratt David Wilson Homes [15660] Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	Object	Disagree with the high-level assessment that only 35% of the site is suitable for further development or that the uplift numbers should be restricted to 360 homes for both the remainder of site GNLP0327 and site GNLP0327. The development of phase two of Newfound Farm has the potential to deliver 500 dwellings at a density that is accepted within the Norwich urban area, of which Cringleford parish is part of.  To overcome this objection, request that the preferred allocation be amended to reflect the delivery of an additional 500 homes plus	<ul style="list-style-type: none"> <li>• Consider as part of further Site assessment</li> </ul>

		land for a primary school on the remainder of the GNLP0307 site that is not covered by the consented scheme.	
Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]	Support	Cringleford Parish Council is generally supportive of the plan for the Parish, and the uplift within the settlement boundary. Furthermore, it is grateful for the continued recognition of some sensitive sites that have been designated unreasonable.	
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	Support	Whilst there are no designated heritage assets within the site boundary, a grade II listed Round House lies to the south east of the site. However, it would appear that there is an existing commitment between the proposed site and the Round House and so there will be no additional harm to that already permitted,	<ul style="list-style-type: none"> <li>• Consider as part of further Site assessment</li> <li>• Consider additional evidence submitted</li> </ul>
Barratt David Wilson Homes [15660] Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	Object	Phase one of the development at Cringleford relates to the consented scheme at Newfound Farm, which is being implemented. Phase two relates to the additional land that the GNLP now proposes for additional housing. Some 11ha of net developable area has been identified, which has a capacity of approximately 500 dwellings based on an average density of 44 dwellings per hectare (dph).	



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy KES2 – Site GNLP0497 Land west of Ipswich Road, Keswick (Carried Forward Employment Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 2 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>
Anglia Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	<ul style="list-style-type: none"> <li>• Consistent policy approach to water efficiency needed.</li> </ul>
Norfolk Wildlife Trust (Mr Mike Jones) [17875]		Our comments below relate to specific ecological concerns regarding allocations. In addition to the protection provided in Policy 2, we recommend that specific wording is included in the allocation policies to ensure accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure).	<ul style="list-style-type: none"> <li>• Consistency Policy approach with regards to ecology.</li> </ul>

		KES2 this site is adjacent to Harford Bridge Marshes CWS and NWT Nature Reserve. Run-off from the development onto the CWS may be an issue and will need to be mitigated for.	
Norwich Apex Limited [19546] Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	Support	On behalf of Norwich Apex Limited (owners of Apex Business Park). Norwich Apex secured planning permission for Apex Business Park in 2018 from South Norfolk Council (2017/2794) and are currently assembling the required infrastructure for the site (including the access, link road and strategic landscaping). Norwich Apex fully support this proposed policy allocation. The land presents the opportunity to provide additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing jobs growth in the Greater Norwich Area over the plan period.	<ul style="list-style-type: none"> <li>• Comment noted</li> <li>• Boundary to be redrawn according to Planning permission.</li> </ul>
Keswick and Intwood Parish Council (Mr P Brooks, Clerk) [12506]	Object	<p>Keswick and Intwood PC believes no further approval should be granted until:</p> <ul style="list-style-type: none"> <li>- the impact (visually and environmentally) of the current development can be assessed and its effect on Keswick village;</li> <li>- the commercial success of the site can be judged in relation to other space available;</li> <li>- the suitability of the road infrastructure to cope with traffic created is evaluated and especially the Low Road traffic scheme;</li> <li>- there is evidence justification for the need of future employment land;</li> <li>- the material benefits of the job creation is shown to outweigh the adverse impact on the local area.</li> </ul>	
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	Object	Whilst there are no designated heritage assets within the site boundary, the grade II listed church of all Saints and remains of the Church of All Saints lies to the west of the site. Any development has the potential to impact upon the setting of these designated heritage assets. There is currently no mention of these assets within the policy or of the need to conserve and where appropriate	<ul style="list-style-type: none"> <li>• Consistency Policy approach with regards to heritage assets.</li> </ul>

		enhance the significance of these nearby heritage assets.  Suggested Change: Amend policy to include reference to the grade II listed Church and remains of church and the need to conserve and where appropriate enhance the significance of these heritage assets.	
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**Cringleford (including employment land at Keswick) – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0461 Land off Gurney Lane, Cringleford (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Cringleford Parish Council (Miss Sonya Blythe, Clerk) [12471]	Support	Cringleford Parish Council is generally supportive of the plan for the Parish, and the uplift within the settlement boundary. Furthermore, it is grateful for the continued recognition of some sensitive sites that have been designated unreasonable	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3047 A140/Mulbarton Road, Keswick (Unreasonable Non-Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Lanpro Services Ltd (Mr Ian Douglass, Head of Planning) [12984]	Object	The site is in a sustainable location and represents an important employment opportunity that should be included in the GNLP. We provide evidence that there will be clear demand for this site over the plan period and that it is needed to meet the growth ambitions of the plan.	<ul style="list-style-type: none"> <li>Consider evidence presented as part of further assessment on sites.</li> </ul>

## DRAYTON

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	DRAYTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 2 Comments

Drayton has 0 Preferred Sites, 1 Carried Forward/Uplift Allocation Policy (DRA1) , 0 Reasonable Alternative Sites and 0 Unreasonable Sites.

### **Drayton – No Reasonable Alternatives (General Comments)**

Representations 1 (1 Support, 0 Object, 0 Comment)

#### Main Issues

Member of the Public Support     The proposal for this site has been in place for several years. Would like to see it built now as suggest it will enhance the village.

## **Policy DRA1 Land east of Cator Road and North of Hall Lane, Drayton (Carried Forward Allocation)**

Representation 3 (0 Support, 1 Object, 2 Comments)

### Main Issues:

Anglian Water      Comment      No reference to water efficiency forming part of design unlike other allocation policies.

Historic England      Object      Suggested Changes: Include reference to the listed building and the need to conserve and where appropriate enhance them.

Individual /member of the public      Comment      Suggest that building work does not commence until the Northern Broadway (NDR) has been completed, linked directly to the A47 towards King Lynn. Also, that the traffic calming measure on Carter Road is put in place.

Sites not commented on through the consultation:

### Unreasonable Residential Sites:

- GNLP0270
- GNLP0271
- GNLP0289
- GNLP0290
- GNLP0301
- GNLP0329
- GNLP2027

### Unreasonable Non-Residential Sites:

- GNLP0465

**Drayton – General Comments**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Drayton – No Reasonable Alternatives (General Comments)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Member of the Public	Support	The proposal for this site has been in place for several years. Would like to see it built now as suggest it will enhance the village.	



## Drayton – Carried Forward Allocation

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy DRA1 Land east of Cator Road and North of Hall Lane, Drayton (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 Comments

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Individual /member of the public	Comment	Suggestion that building work does not commence until the Northern Broadway (NDR) has been completed, linked directly to the A47 towards King Lynn. Also, that the traffic calming measure on Carter Road is put in place.	
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.
Historic England	Object	Suggested Changes: Include reference to the listed building and the need to conserve and where appropriate enhance them Suggested wording: Development should conserve or where appropriate enhance the significance of the grade II listed 4 Manor Farm Close (noting that	Check Policy wording

		significance may be harmed by development within the setting of an asset) through appropriate landscaping, setback and design	
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## EASTON AND HONINGHAM

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	EASTON AND HONINGHAM OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	86
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	10 Support, 66 Object, 10 Comment

Easton and Honingham has 1 Preferred Site, 1 Carried forward / uplift Allocation, 1 Reasonable Alternative Site and 2 Unreasonable Sites

### **Site GNLP2176 Land North of Dereham Road, Honingham (Preferred Site)**

Representations 40 (4 Support, 34 Object, 2 Comment)

#### Main Issues:

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Member of the public Comment There would be immense detrimental impact to a village that is currently deprived of utilities, medical and education services. No shop, limited bus service and an increase in pollution and narrow roads. An impact on the countryside, birds of prey and hedgerows and removal of a quaint village into a sprawling metropolis.

Bidwells Support On behalf of the Rampton Property Trust, we strongly support the preferred option. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils housing needs during the period to 2038.

Members of the public Support infill, which can do no real harm to the village. Access to Norwich and Dereham will be enhanced once the A47 is improved, so commuting will be no real issue.

Small developments in each village is far preferable to the large scale proposed for the Easton, Colton and Honingham areas. So long as this is a remains as small-scale infill development. It needs to be designed in a sympathetic way to limit its impact on existing properties and to blend in with surrounding area.

Members of the public Object There is a lack of facilities, no shop, no Post Office, no School, no Doctors surgery. All these would have to be accessed outside the Village, bus services are limited and cannot be relied upon for commuting. Brownfield sites in Norwich are far better placed for this allocation. Few job opportunities so workers would need to commute. This is will lead to more housing, potential effect on wildlife, crime, pressure on roads, drainage. This land should be retained for food production.

### **Policy EAS1 Land south and east of Easton (Carried Forward Allocation and Uplift)**

Representations 11 (1 Support, 8 Object, 2 Comment)

#### Main Issues :

John Long Planning/ Persimmons Homes Support Persimmon Homes (Anglia) supports the site capable of accommodating additional homes beyond those identified in the previous Plan (900) and as permitted by the outline consent (890) and likely to be permitted (64). However, it is not appropriate for the Policy to ignore the fact that many of the Policy's requirements are met through the consent planning conditions and accompanying S106 agreement. Also, the housing figure should be expressed as a minimum.

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Easton Parish Council Object The land suggested for 90 houses is in the process of being sold to Norfolk County Council for use as a Special Education Needs school and as such EAS1 cannot accommodate these extra 90 homes.

Historic England Object Suggest that the policy is improved by adding 'Development should conserve or where appropriate enhance the significance of the grade I listed Church of St Peter (noting that significance may be harmed by development within the setting of an asset) and ensure that sufficient open space'.

Members of the public      Object This is too much for a small village to accommodate. No infrastructure, public transport, not on fine agricultural land when there are more appropriate, larger sites elsewhere. This will lead to congestion, increased air pollution, damage to wildlife, destruction of the rural countryside.

**Site GNLP0415R-A-G Honingham Thorpe - Strategic mixed-use development consisting of residential development, employment, country park and nature reserve (Reasonable Alternative Site) Garden Village**

Representations 28 (0 Support, 23 Object, 5 Comment)

Main Issues:

Honingham Parish Council Objection      Far too large, would swamp the countryside and develop huge urban sprawl. No infrastructure, maybe a reasonable alternative in 50 years time.

Members of the Public      Objection      This scale of development would have a detrimental effect on a large surrounding area as highlighted from many local parishes about the effect of increased traffic resulting from proposed new road schemes terminating in the Honingham area. This site could have far more impact on these people. As already pointed out these sites are proposed on irreplaceable prime agricultural land. A development of this scale should only be part of the city of Norwich not annexed in the countryside. Concern over the lack of facilities including doctors, shop, bus service, etc. Potential impact on existing infrastructure, wildlife, etc. Duelling of the Western link is necessary but not the Garden Village.

Environment Agency Comment      GNLP0415R-E and GNLP0415R-F Allocations adjacent to the River Yare of a nature reserve and Country Park are welcomed. GNLP0415R-E The south of this site allocation, adjacent to the river lies in Flood Zones 2 and 3. Our detailed modelling shows that much of the area covered by Flood Zone 3 is actually Flood Zone 3b. Therefore, it would be preferable if any associated built development is located within Flood Zone 1, and all development within the flood zones meets the above requirements. GNLP0415R-F The north of the site adjacent to the river lies in Flood Zones 2 and 3. Our detailed modelling shows that quite a lot of the area covered by Flood Zone 3 is actually Flood Zone 3b. As a nature reserve would be classed as water compatible development under Amenity open space, nature conservation and biodiversity then this would be an acceptable land use within the flood zones, including Flood Zone 3b, providing that it is designed to: remain operational and safe for users in times of flood; result in no net loss of floodplain storage; and not impede water flows and not increase flood risk elsewhere. Therefore, it would be preferable if any associated built development is located within Flood Zone 1. GNLP0415R-A, GNLP0415R-C

There are two sites adjacent to the River Tud another chalk stream , we need to ensure that any water discharging from the development is as clean as possible and that SuDS are sufficient, a WFD compliance assessment must be undertaken.

### **Site GNLP0456 Land off A47, Easton (Unreasonable Residential Site)**

Representations: 3 (2 Support, 0 Object, 1 Comment)

#### Main Issues:

Easton Parish Council      Comment      Support the reasoning of no safe connection to the main part of the village however as the A47 is in the process of being improved and the Parish Council is working with Highways England to provide a suitable safe route for pedestrians and cyclists across the A47. We do not feel it should be discounted until Highways England have finalised their design plans for the A47 improvements in this area.

Members of the Public      Support Concerned over the potential impact on the village, wildlife, lack of infrastructure.

### **Site GNLP0411 Land at Fellowes Road, Honingham (Unreasonable Residential Site)**

Representations 4 (3 Support, 1 Object, 0 Comment)

#### Main Issues:

Honingham Parish Council      Support      the classification of site GNLP0411 as being unreasonable. This site is wholly unsuitable for development, not least because of the very limited access, but the nature of the site as being sloping. There are no services within the village making this site unsustainable and unsuitable.

Members of the Public      Support      Small land area on a slope, once concreted over all the water that would have been absorbed will wash into Mill Lane flooding homes and the unmadeup road. Flooding already a problem at entrance to Mill Lane, this will just exacerbate it. Only access will be via Colton Road - which is actually a single track road unsuitable for the constant flow of heavy vehicles needed during build phase. Safety concerns over Fellowes Road. No amenities in village such as schools, Drs, shops, buses. Would need cars therefore extra pollution.

Brown & Co Object The proposal would form a better alternative to the current proposed allocation by virtue of its relationship with the main built form of the village, proximity to bus stops, and opportunity to improve the permeability and connectivity of the village.

Sites not commented on through the consultation:

- None

## Easton and Honingham – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2176 Land North of Dereham Road, Honingham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	40
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	4 Support, 34 Object, 2 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>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.
Member of the public	Comment	There would be immense detrimental impact to a village that is currently deprived of utilities, medical and education services. No shop, limited bus service and an increase in pollution and narrow roads. An impact on the countryside, birds of prey and hedgerows and removal of a quaint village into a sprawling metropolis.	
Bidwells	Support	On behalf of the Rampton Property Trust, we strongly support the preferred option. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils housing needs during the period to 2038.	



		It is recognised that more homes may be accommodated on the site, subject to an acceptable design and layout, as well.	
Members of the public	Support	<p>infill, which can do no real harm to the village. Access to Norwich and Dereham will be enhanced once the A47 is improved, so commuting will be no real issue.</p> <p>Small developments in each village is far preferable to the large scale proposed for the Easton, Colton and Honingham areas. So long as this is a remains as small-scale infill development. It needs to be designed in a sympathetic way to limit its impact on existing properties and to blend in with surrounding area.</p>	
Various members of the public	Object	<p>There is a lack of facilities, no shop, no Post Office, no School, no Doctors surgery. All these would have to be accessed outside the Village, bus services are limited and cannot be relied upon for commuting. Brown field sites in Norwich are far better placed for this allocation. Few job opportunities so workers would need to commute.</p> <p>This is will lead to more housing, potential effect on wildlife, crime, pressure on roads, drainage. This land should be retained for food production.</p>	

## Easton and Honingham – Carried Forward Allocation/Uplift

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy EAS1 Land south and east of Easton (Carried Forward Allocation and Uplift)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	11
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 8 Object, 2 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>
John Long Planning Persimmons Homes	Support	Persimmon Homes (Anglia) supports the site capable of accommodating additional homes beyond those identified in the previous Plan (900) and as permitted by the outline consent (890) and likely to be permitted (64). However, it is not appropriate for the Policy to ignore the fact that many of the Policy's requirements are met through the consent planning conditions and accompanying S106 agreement. Also, the housing figure should be expressed as a minimum.	Consistency policy approach with planning consent
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.

Easton Parish Council	Object	The land suggested for 90 houses is in the process of being sold to Norfolk County Council for use as a Special Education Needs school and as such EAS1 cannot accommodate these extra 90 homes.	
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	Object	We note that this is a carried forward allocation and so the principle of development has already been established. We welcome criteria 7 and 8 which refer to heritage assets. Suggest that the policy is improved by adding the following at the start of criterion 8 Suggested Changes: Development should conserve or where appropriate enhance the significance of the grade I listed Church of St Peter (noting that significance may be harmed by development within the setting of an asset) and ensure that sufficient open space.	Consistent policy approach to protect grade listed building.
Members of the public	Object	This is too much for a small village to accommodate. No infrastructure, public transport, not on fine agricultural land when there are more appropriate, larger sites elsewhere. This will lead to congestion, increased air pollution, damage to wildlife, destruction of the rural countryside.	

## Easton and Honingham – Reasonable Alternative Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0415R-A-G Honingham Thorpe - Strategic mixed-use development consisting of residential development, employment, country park and nature reserve (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	28
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 23 Object, 5 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>
Honingham Parish Council (Mr Roger Human, Parish Councillor) [15434]	Objection	Far too large, would swamp the countryside and develop huge urban sprawl. No infrastructure, maybe a reasonable alternative in 50 years time.	
Members of the Public	Objection	This scale of development would have a detrimental effect on a large surrounding area as highlighted from many local parishes about the effect of increased traffic resulting from proposed new road schemes terminating in the Honingham area. This site could have far more impact on these people. As already pointed out these sites are proposed on irreplaceable	

		<p>prime agricultural land.  A development of this scale should only be part of the city of Norwich not annexed in the countryside.  Concern over the lack of facilities including doctors, shop, bus service, etc. Potential impact on existing infrastructure, wildlife, etc.  Duelling of the Western link is necessary but not the Garden Village.</p>	
<p>Environment Agency (Eastern Region) (Mr Liam Robson, Planning Advisor (lead officer)) [18780]</p>	<p>Comment</p>	<p>GNLP0415R-E and GNLP0415R-F  Allocations adjacent to the River Yare of a nature reserve and Country Park are welcomed.</p> <p>GNLP0415R-E  The south of this site allocation, adjacent to the river lies in Flood Zones 2 and 3. Our detailed modelling shows that much of the area covered by Flood Zone 3 is actually Flood Zone 3b  Therefore, it would be preferable if any associated built development is located within Flood Zone 1, and all development within the flood zones meets the above requirements.</p> <p>GNLP0415R-F  The north of the site adjacent to the river lies in Flood Zones 2 and 3. Our detailed modelling shows that quite a lot of the area covered by Flood Zone 3 is actually Flood Zone 3b. As a nature reserve would be classed as water compatible development under Amenity open space, nature conservation and biodiversity then this would be an acceptable land use within the flood zones, including Flood Zone 3b, providing that it is designed to: remain operational and safe for users in times of flood; result in no net loss of floodplain storage; and not impede water flows and not increase flood risk elsewhere.  Therefore, it would be preferable if any associated built development is located within Flood Zone 1.</p> <p>GNLP0415R-A, GNLP0415R-C</p>	<p>Follow up with further assessment</p>

		There are two sites adjacent to the River Tud another chalk stream , we need to ensure that any water discharging from the development is as clean as possible and that SuDS are sufficient, a WFD compliance assessment must be undertaken.	
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## Easton and Honingham – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0456 Land off A47, Easton (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>
Easton Parish Council (Mr Peter Milliken, Chairman) [19440]	Comment	Support the reasoning of no safe connection to the main part of the village however as the A47 is in the process of being improved and the Parish Council is working with Highways England to provide a suitable safe route for pedestrians and cyclists across the A47. We do not feel it should be discounted until Highways England have finalised their design plans for the A47 improvements in this area.	
Members of the Public	Support	Concerned over the potential impact on the village, wildlife, lack of infrastructure.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0411 Land at Fellowes Road, Honingham (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	3 Support, 1 Object, 0 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>
Honingham Parish Council (Ms Jordana Wheeler, Clerk) [14400]	Support	Honingham Parish Council support the classification of site GNLP0411 as being unreasonable. This site is wholly unsuitable for development, not least because of the very limited access, but the nature of the site as being sloping. There are no services within the village making this site unsustainable and unsuitable.	
Members of the Public	Support	Small land area on a slope, once concreted over all the water that would have been absorbed will wash into Mill Lane flooding homes and the unmadeup road. Flooding already a problem at entrance to Mill Lane, this will just exacerbate it. Only access will be via Colton Road - which is actually a single track road unsuitable for the constant flow of heavy vehicles needed during build phase. Safety concerns over Fellowes Road. No amenities in village such as schools, Drs, shops, buses. Would need cars therefore extra pollution.	



Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	Object	<p>The proposal would form a better alternative to the current proposed allocation by virtue of its relationship with the main built form of the village, proximity to bus stops, and opportunity to improve the permeability and connectivity of the village.</p> <p>Enhancements would be delivered to ensure suitable safe access could be provided to the site for vehicles and pedestrians alike, as a result it is considered that safe access to school could be provided for children.</p>	
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## HELLESDON

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	HELLESDON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	92
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	40 Support, 43 Object, 9 Comment

Hellesdon has 0 Preferred sites, 4 Carried Forward/Uplift Allocations, 2 Reasonable Alternative Sites, and 1 Unreasonable Site.

### **Policy HEL1 Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (Carried Forward Allocation)**

Representations: 1 (1 Support, 0 Object, 0 Comment)

#### Main Issues

Norfolk and Suffolk NHS Foundation Trust / Bidwells Support      On behalf of Norfolk and Suffolk NHS Foundation Trust , we strongly support the allocation of Hellesdon Hospital under Policy HEL1 for residential and employment uses.

**Policy HEL2 Land at the Royal Norwich Golf Club, either side of Drayton High Road, Hellesdon (Carried Forward Allocation)**

Representations: 2 (1 Support, 0 Object, 1 Comment)

Main Issues

Hellesdon Neighbourhood Group Comment it is important that there is consultation with the local parish council in order to consider the Hellesdon Neighbourhood Plan when designing subsequent phases of this development.

Persimmon Homes (Anglia Region) /John Long Planning Support Policy should take into account Master Plan currently being revised to take account of additional requirements not anticipated by previous allocation and existing legal agreements for instance provision of school etc.

**Policy HEL4 / Site GNLP1019 Land northeast of Reepham Road (Carried Forward Allocation)**

Representations: 2 (0 Support, 1 Object, 1 Comment)

Main Issues

Individual Comment Due to the location of HEL4 this allocation cannot fulfil its intention for open space. It is remote from the centre of Hellesdon and only residents on the northern boundary can access it easily, there is currently no provision for parking (and there is not likely to be due to the necessary costs).

CODE Development Planners Ltd Object The landowners object to the allocation of 11.08 hectares for recreational open space.

**Site GNLP1021 Rear of Health Crescent, Prince Andrews Road, Hellesdon (Reasonable Alternative Site)**

\*This site is also being considered for residential uses by landowner See GNLP 2173

Representations: 40 (37 Support, 0 Object, 3 Comment)

Main Issues:

Hellesdon Parish Council Support There is clear support from the community and robust evidence demonstrating an undersupply of formal and informal open space at Hellesdon. The Neighbourhood Plan seeks to allocate this site for open space and suggest that BDC could assist through compulsory purchase of the land from Jarrolds.

Members of the Public (various) Support for the Open Space at this location in order to play bowls, football, tennis, running etc. This is an area of extensive growth therefore, open space would be widely needed. There is wide support for mental health and by utilising this land for open space it supports this objective.

**Site GNLP2173 Rear of Heath Crescent, Hellesdon (Reasonable Alternative Site)**

Also being considered for Leisure purposes – see GNLP1021

Respondents 45 (1 Support, 42 Object, 2 Comment)

Main Issues:

CODE Development Planners Ltd Support On behalf of Jarrolds and Sons the owners of the site. Redevelopment of the site closed for open space in 2016 would provide new homes to serve the need of the community.

Members of the public (various) Object Numerous objections for the redeveloped of this site due to the potential loss of open space and associated benefits including wellbeing etc.

Individual Comment The site should be retained for open space for the enjoyment of the residents on the eastern side of Hellesdon as residents would need to cross two major roads to access leisure facilities.

**Site GNLP2142 West of Hellesdon Park Industrial Estate, Hellesdon (Unreasonable Non-Residential Site)**

Representation 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Brown & Co Object The site provides an opportunity to provide a sustainable employment area that would complement the existing industrial estate to the east

Sites not commented on through the consultation:

Carried Forward Allocations

- Policy HEL2/ GNLP1020

## Hellesdon – Carried Forward Allocations

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HEL1 Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Norfolk and Suffolk NHS Foundation Trust [19404] Bidwells (Mr Iain Hill, Partner) [16273]	Support	On behalf of Norfolk and Suffolk NHS Foundation Trust (the Trust), we strongly support the allocation of Hellesdon Hospital under Policy HEL1 for residential and employment uses. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period to 2038	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HEL2 Land at the Royal Norwich Golf Club, either side of Drayton High Road, Hellesdon (Carried Forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
Hellesdon Neighbourhood Group Mr Marlon Fulcher [14630]	Comment	it is important that there is consultation with the local parish council in order to consider the Hellesdon Neighbourhood Plan when designing subsequent phases of this development.	Liaise with Neighbourhood Group
Persimmon Homes (Anglia Region) (Miss Laura Townes, Planning Manager) [13972] John Long Planning (Mr John Long, Owner) [13586]	Support	Policy should take into account Master Plan currently being revised to take account of additional requirements not anticipated by previous allocation and existing legal agreements for instance provision of school etc.	To follow up with DM officers

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy HEL4 / Site GNLP1019 Land northeast of Reepham Road (Carried Forward Allocation)
<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>
Individual	Comment	Due to the location of HEL4 this allocation cannot fulfil its intention for open space. It is remote from the centre of Hellesdon and only residents on the northern boundary can access it easily, there is currently no provision for parking (and there is not likely to be due to the necessary costs). If HEL4 is to be counted as allocation for recreational open space then it must serve the majority of the parish, much of which is over 1.5 miles distant. It is irresponsible to create a green space which you then need to use the car to drive to!	
CODE Development Planners Ltd (Karen Gray) [19658]	Object	The landowners object to the allocation of 11.08 hectares for recreational open space.  In our view, unless and until appropriate evidence is prepared, the draft allocation for recreational open space on 11. 08 hectares of land at Reepham Road should be deleted. The landowners continue to encourage dialogue with all relevant parties, including the parish councils in order to identify the most appropriate	



		provision of recreational open space to meet the requirements of various forms of outdoor recreation.	
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## Hellesdon – Reasonable Alternative Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1021 Rear of Health Crescent, Prince Andrews Road, Hellesdon (Reasonable Alternative Site) *This site is also being considered for residential uses by landowner See GNLP 2173
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	40
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	37 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>
Members of the Public (various)	Support	Support for the Open Space at this location in order to play bowls, football, tennis, running etc. This is an area of extensive growth therefore, open space would be widely needed. There is wide support for mental health and by utilising this land for open space it supports this objective.	
Hellesdon Parish Council	Support	There is clear support from the community and robust evidence demonstrating an undersupply of formal and informal open space at Hellesdon. The Neighbourhood Plan seeks to allocate this site for open space and suggest that BDC could assist through compulsory purchase of the land from Jarrolds.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2173 Rear of Heath Crescent, Hellesdon (Reasonable Alternative Site) Also being considered for Leisure purposes – see GNLP1021
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	45
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 42 Object, 2 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>
CODE Development Planners Ltd (Miss Helen Adcock, Director) [12557]	Support	On behalf of Jarrolds and Sons the owners of the site. Redevelopment of the site closed for open space in 2016 would provide new homes to serve the need of the community.	
Members of the public (various)	Object	Numerous objections for the redeveloped of this site due to the potential loss of open space and associated benefits including well being etc. Not to mention the loss of the Golf course to residential development and other sites nearby.	
Individual	Comment	The site should be retained for open space for the enjoyment of the residents on the eastern side of Hellesdon as residents would need to cross two major roads to access leisure facilities.	

## Hellesdon – Unreasonable Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2142 West of Hellesdon Park Industrial Estate, Hellesdon (Unreasonable Non-Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	Object	The site provides an opportunity to provide a sustainable employment area that would complement the existing industrial estate to the east. It would provide a range of units to encourage start-up business as well as the opportunity for existing business to move to larger premises. The site is situated within the built-up area of Hellesdon and within easy reach of residential, commercial and retail uses. Development would provide community benefits through a community woodland and extension to the burial ground.	

## RACKHEATH

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	RACKHEATH OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	14
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 3 Object, 9 Comment

Rackheath has 2 Preferred sites, 0 Carried Forward / Uplift allocations, 0 Reasonable Alternatives and 8 Unreasonable Sites.

### **Site GNLP0172 Land to the west of Green Lane West, Rackheath (Preferred Site)**

Representations 3 (1 Support, 1 Object, 1 Comment)

#### Main Issues:

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Carter Jonas LLP Support Taylor Wimpey East Anglia control land to the west of Green Lane West in Rackheath. An outline planning application for 205 dwellings has been submitted for the promoted development (Ref. 2017/2208). This site has a resolution to grant planning permission and the S106 Agreement has been signed.

Historic England Object Amend policy to state that land to the west of the A1270 should only be used for open space to conserve and where opportunities arise enhance the significance of the grade II listed Rackheath Hall and bridge.

### **Site GNLP0351 Land at Heathwood Gospel Hall, Green Lane West, Rackheath (Preferred Site)**

Representations 1 (0 Support, 0 Object, 1 Comment)

#### Main Issues :

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

### **Site GNLP0095 Land to the east of Salhouse Road, Rackheath (Unreasonable Residential Site)**

Representations 2 (0 Support, 1 Object, 1 Comment)

#### Main Issues:

Rackheath Parish Council Comment Salhouse Road sites will only be supported if the road is widened, speed reduced to 40mph, rapid transport route implemented along Salhouse Road and connected to the city, direct cycle route to link Thorpe End, Salhouse and Sprowston and woodland planting on boundaries and existing woodland area. Developments should link to communities and commuter routes. Access to the NDR is challenging enough already.

GP Planning Ltd Object on the landowner to site being considered unreasonable. This is a small site proposed for up to 8 dwellings. The site is considered sufficiently far from Rackheath Hall to not cause significant impact. Access can readily be achieved from Salhouse Road.

### **Site GNLP1029 Land east of Back Lane, Rackheath (Unreasonable Residential Site)**

Representations 1 (0 Support, 0 Object, 1 Comment)

#### Main Issues:

Rackheath Parish Council Comment Objection due to the scale being out of proportion for the area. It's located at the edge of our boundary with poor access to the community centre. The location is over 3km from the school with poor cycle and path access across a very busy road.

**Site GNLP1060 Land to the south of Swash Lane and Muck Lane, Rackheath (Unreasonable Residential Site)**

Representations 1 (0 Support, 0 Object, 1 Comment)

Main Issues:

Rackheath Parish Council Comment Parish Council would prefer to see this site used for recreational use instead of housing as there is already a large housing supply allocated for Rackheath e.g. GT16.

**Site GNLP2037 North east of Green Lane West, Rackheath (Unreasonable Residential Site)**

Representations 2 (1 Support, 0 Object, 1 Comment)

Main Issues:

GP Planning Ltd Support The promoters of the site SUPPORT the conclusions in assessment. It is noted that the site is unlikely to be able to accommodate the minimum level of development. Also suggests that there is potential for the site, with sympathetic design, to accommodate greater than 10 units but would not wish the development of the site to be prejudiced without an allocation status.

Rackheath Parish Council Comment No objection as it is in the village and front facing properties would be in keeping with the feel of the village and adjacent properties.

### **Site GNLP2092 South of Salhouse Road, Rackheath (Unreasonable Residential Site)**

Representations 2 (0 Support, 0 Object, 2 Comment)

#### Main Issues:

Rackheath Parish Council Comment No objection as it is in the village and front facing properties would be in keeping with the feel of the village and adjacent properties.

Rackheath Parish Council Comment Salhouse Road sites will only be supported if the road is widened, speed reduced to 40mph, rapid transport route implemented along Salhouse Road and connected to the city, direct cycle route to link Thorpe End, Salhouse and Sprowston and woodland planting on boundaries and existing woodland area. Developments should link to communities and commuter routes. Access to the NDR is challenging enough already.

### **Site GNLP2166 Land at South of Warren Road, Rackheath (Unreasonable Residential Site)**

Representations 3 (0 Support, 1 Object, 2 Comment)

#### Main Issues:

Rackheath Parish Council Comment Objection due to the scale being out of proportion for the area. It's located at the edge of our boundary with poor access to the community centre. The location is over 3km from the school with poor cycle and path access across a very busy road.

Rackheath Parish Council Comment Salhouse Road sites will only be supported if the road is widened, speed reduced to 40mph, rapid transport route implemented along Salhouse Road and connected to the city, direct cycle route to link Thorpe End, Salhouse and Sprowston and woodland planting on boundaries and existing woodland area. Developments should link to communities and commuter routes. Access to the NDR is challenging enough already.

Lanpro Services Ltd Object Site is considered to be suitable for residential development, and it doesn't generate any significant harm that could not be dealt with during the normal course of preparing a planning application.



Sites not commented on through the consultation:

Unreasonable Residential Sites

- GNLP0478
- GNLP1030

## Rackheath – Preferred Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0172 Land to the west of Green Lane West, Rackheath (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 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>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.
Carter Jonas LLP (Mr Richard Seamark, Partner) [14157]	Support	Taylor Wimpey East Anglia control land to the west of Green Lane West in Rackheath. An outline planning application for 205 dwellings has been submitted for the promoted development (Ref. 2017/2208). This site has a resolution to grant planning permission and the S106 Agreement has been signed. In conclusion, it is requested that. GNLP0172) is retained as an allocation .	<ul style="list-style-type: none"> <li>Consider policy wording and check for consistency with planning permission.</li> </ul>

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]</p>	<p>Object</p>	<p>The reference to Rackheath Hall is welcomed, the need for open space to be provided in the land to the west of the A1270. This requirement should be included in the policy Suggested Change: Amend policy to state that land to the west of the A1270 should only be used for open space to conserve and where opportunities arise enhance the significance of the grade II listed Rackheath Hall and bridge.</p>	<ul style="list-style-type: none"> <li>• Amend Policy wording as suggested.</li> </ul>
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0351 Land at Heathwood Gospel Hall, Green Lane West, Rackheath (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	<ul style="list-style-type: none"> <li>Consistent policy approach to water efficiency needed.</li> </ul>

## Rackheath – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0095 Land to the east of Salhouse Road, Rackheath (Unreasonable Residential Site)
<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>
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	Comment	Salhouse Road sites will only be supported if the road is widened, speed reduced to 40mph, rapid transport route implemented along Salhouse Road and connected to the city, direct cycle route to link Thorpe End, Salhouse and Sprowston and woodland planting on boundaries and existing woodland area. Developments should link to communities and commuter routes. Access to the NDR is challenging enough already.	
GP Planning Ltd (Maureen Darrie, Director) [14933]	Object	The landowner OBJECTS to it being considered unreasonable. This is a small site proposed for up to 8 dwellings. The site is considered sufficiently far from Rackheath Hall to not cause significant impact. Access can readily be achieved from Salhouse Road.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1029 Land east of Back Lane, Rackheath (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	Comment	Objection due to the scale being out of proportion for the area. It's located at the edge of our boundary with poor access to the community centre. The location is over 3km from the school with poor cycle and path access across a very busy road.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP1060 Land to the south of Swash Lane and Muck Lane, Rackheath (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	Comment	Parish Council would prefer to see this site used for recreational use instead of housing as there is already a large housing supply allocated for Rackheath e.g. GT16.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2037 North east of Green Lane West, Rackheath (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 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>
GP Planning Ltd (Maureen Darrie, Director) [14933]	Support	The promoters of the site SUPPORT the conclusions in assessment. It is noted that the site is unlikely to be able to accommodate the minimum level of development. Also suggests that there is potential for the site, with sympathetic design, to accommodate greater than 10 units but would not wish the development of the site to be prejudiced without an allocation status.	
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	Comment	No objection as it is in the village and front facing properties would be in keeping with the feel of the village and adjacent properties.	



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2092 South of Salhouse Road, Rackheath (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 2 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>
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]		No objection as it is in the village and front facing properties would be in keeping with the feel of the village and adjacent properties.	
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]		Salhouse Road sites will only be supported if the road is widened, speed reduced to 40mph, rapid transport route implemented along Salhouse Road and connected to the city, direct cycle route to link Thorpe End, Salhouse and Sprowston and woodland planting on boundaries and existing woodland area. Developments should link to communities and commuter routes. Access to the NDR is challenging enough already.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2166 Land at South of Warren Road, Rackheath (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 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>
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	Comment	Objection due to the scale being out of proportion for the area. It's located at the edge of our boundary with poor access to the community centre. The location is over 3km from the school with poor cycle and path access across a very busy road.	
Rackheath Parish Council (Mrs Anne Tandy, Clerk) [12989]	Comment	Salhouse Road sites will only be supported if the road is widened, speed reduced to 40mph, rapid transport route implemented along Salhouse Road and connected to the city, direct cycle route to link Thorpe End, Salhouse and Sprowston and woodland planting on boundaries and existing woodland area. Developments should link to communities and commuter routes. Access to the NDR is challenging enough already.	
Lanpro Services Ltd (Mrs Jane Crichton, Associate Planner) [12905]	Object	Site is considered to be suitable for residential development, and it doesn't generate any significant harm that could not be dealt with during the normal course of preparing a planning application.	

## SPROWSTON

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	SPROWSTON OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	17
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	7 Support, 4 Object, 6 Comment

Sprowston has 1 Preferred Site, 0 Carried forward/ Uplift Allocations, 2 Reasonable Alternatives and 2 Unreasonable Sites.

### **Sprowston – Site Assessment Booklet (General Comments)**

Representations 1 (0 Support, 0 Object, 1 Comment)

#### Main Issues:

Sprowston Town Council comment Correction on a number of factual inaccuracies in the "draft gnlp sites, sprowston site assessment booklet

**Site GNL0132 Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (Preferred Site).**

Representations 9 (4 Support, 1 Object, 4 Comment)

Main Issues:

Sprowston Town Council Support that this site should be classified as a preferred residential site

Hopkins Homes, Persimmon Homes and Taylor Wimpey / Bidwells Support the preferred allocation of GNL0132, Policy wording should be adjusted to indicate that 1200 units is a minimum figure, and flexibility introduced in relation to affordable housing.

Mr Oliver Gurney Support On behalf of client White House Farm supports this proposed housing allocation. It will be important to secure a strategic buffer around White House Farm in the masterplan proposals for this allocation.

Historic England Support Although Rackheath Hall, grade II listed lies to the east of the site, the intervening vegetation should provide a suitable buffer. We welcome the reference to the historic parkland and need for protection of trees in bullet point 5.

Norfolk Wildlife Trust Comment This site includes an area of ancient woodland in the south-west corner of the proposed allocation. This area should be safeguarded through sufficient buffering (at least 50m, preferably 100m, in line with Woodland Trust guidance). It should be accompanied by an ecological appraisal, with provision of biodiversity net gain (potentially also delivering contributions to green infrastructure).

Environment Agency Comment Sites such as this which intersect water courses should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.

The Woodland Trust Object Concerned about the potentially adverse impacts will have in relation to an area of ancient woodland known as Bulmer Coppice. For this reason, we believe the site is unsound and should not be taken forward.

**Site GNLP0383 Sprowston Park and Ride (High School or redevelopment for housing if a school is not required).**

**(Reasonable Non-Residential Alternative)**

Representations 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Sprowston Town Council Object If the site is not to be redeveloped for a new school it should be allocated for civic use, and not (as proposed in the draft) for housing.

**Site GNLP3024 White House Farm, Sprowston (Multi use Community Hub) (Reasonable Alternative – Non-Residential Site)**

1,200 dwellings

Representations 3 (2 Support, 0 Object, 1 Comment)

Main Issues:

Sprowston Town Council Support that this site should be classified as a reasonable alternative non-residential site.

Mr Oliver Gurney / La Ronde Write On behalf of client support reasonable alternative for multi-use hub. We currently have a thriving hub of local businesses (planning application No. 20160106). See full rep for details.

Environment Agency Comment This site intersects water courses therefore, should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.

**Site GNLP0042 Land at Rear of Hill Farm House, Wroxham Road, Sprowston (Unreasonable Residential Site)**

Representations 2 (1 Support, 1 Object, 0 Comment)

Main Issues:

Sprowston Town Council Support that this site should be classified as an unreasonable residential site. As its too remote, outside the current settlement boundary, and not well served by public transport or other necessary infrastructure.

Arnold Keys on behalf of clients Object We seek the identification of site GNLP0042 (Land at rear of Hill Farmhouse, Wroxham Road) as a 'Preferred Housing Allocation' in the GNLP. An HELAA RAG assessment has been undertaken to demonstrate that the site is available, achievable and suitable for allocation.

**Site GNLP2178 Lushers Loke, Sprowston (Unreasonable Residential Site)**

Representations 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Sprowston Town Council objects to this site being classified as an unreasonable residential site council strongly opposes the suggestion that this is an unreasonable site for residential development and fully supports its inclusion instead as a preferred residential site.

Sites not commented on through the consultation:

- None

## Sprowston – General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Sprowston – Site Assessment Booklet (General Comments)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 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>
Sprowston Town Council (Mr Guy Ranaweera, Town Clerk) [18972]	comment	Correction on a number of factual inaccuracies in the "draft gnlp sites, Sprowston site assessment booklet: Sprowston has three wards not two as stated, there is not a designated district centre housing allocations <u>were</u> included in the Sprowston Neighbourhood Plan - See Policy 18.	Corrections to follow up

## Sprowston – Preferred Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0132 Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (Preferred Site).
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	4 Support, 1 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>
Sprowston Town Council (Mr Guy Ranaweera, Town Clerk) [18972]	Support	Supports that this site should be classified as a preferred residential site	
Hopkins Homes, Persimmon Homes and Taylor Wimpey [16216] Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	Support	Support the preferred allocation of GNLP0132, Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston. Policy wording should be adjusted to indicate that 1200 units is a minimum figure, and flexibility introduced in relation to affordable housing.	Review policy wording



<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Mr Oliver Gurney [19599] Mrs Nicole Wright [14312]	Support	On behalf of client White House Farm supports this proposed housing allocation. It will be important to secure a strategic buffer around White House Farm in the masterplan proposals for this allocation.	
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	Support	Although Rackheath Hall, grade II listed lies to the east of the site, the intervening vegetation should provide a suitable buffer. We welcome the reference to the historic parkland and need for protection of trees in bullet point 5.	Review Policy wording
Norfolk Wildlife Trust (Mr Mike Jones) [17875]	Comment	This site includes an area of ancient woodland in the south-west corner of the proposed allocation. This area should be safeguarded through sufficient buffering (at least 50m, preferably 100m, in line with Woodland Trust guidance).It should be accompanied by an ecological appraisal, with provision of biodiversity net gain (potentially also delivering contributions to green infrastructure).	Review Policy wording
Environment Agency (Eastern Region) (Mr Liam Robson, Planning Advisor (lead officer)) [18780]	Comment	Sites such as this which intersect water courses should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.	Review Policy wording
The Woodland Trust (Ms Isla King, Assistant Campaigner) [19608]	Object	Concerned about the potentially adverse impacts will have in relation to an area of ancient woodland known as Bulmer Coppice. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.	Consider policy wording

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
		For this reason, we believe the site is unsound and should not be taken forward.	

### Sprowston – Reasonable Alternative Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0383 Sprowston Park and Ride (High School or redevelopment for housing if a school is not required). (Reasonable Non-Residential Alternative)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Sprowston Town Council (Mr Guy Ranaweera, Town Clerk) [18972]		If the site is not to be redeveloped for a new school it should be allocated for civic use, and not (as proposed in the draft) for housing.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3024 White House Farm, Sprowston (Multi use Community Hub) (Reasonable Alternative – Non-Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 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>
Sprowston Town Council (Mr Guy Ranaweera, Town Clerk) [18972]	Support	Supports that this site should be classified as a reasonable alternative non-residential site.	
Mr Oliver Gurney [19599] Mrs Nicole Wright [14312]	Support	On behalf of client support reasonable alternative for multi -use hub. We currently have a thriving hub of local businesses (planning application No. 20160106). See full rep for details.	
Environment Agency (Eastern Region) (Mr Liam Robson, Planning Advisor (lead officer)) [18780]	Comment	This site intersects water courses therefore, should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.	Review policy wording

## Sprowston – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0042 Land at Rear of Hill Farm House, Wroxham Road, Sprowston (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 0 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>
Sprowston Town Council (Mr Guy Ranaweera, Town Clerk) [18972]	Support	Support that this site should be classified as an unreasonable residential site. As its too remote, outside the current settlement boundary, and not well served by public transport or other necessary infrastructure.	
Arnold Keys on behalf of clients	Object	We seek the identification of site GNLP0042 (Land at rear of Hill Farmhouse, Wroxham Road) as a 'Preferred Housing Allocation' in the GNLP. An HELAA RAG assessment has been undertaken to demonstrate that the site is available, achievable and suitable for allocation.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2178 Lushers Loke, Sprowston (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Sprowston Town Council (Mr Guy Ranaweera, Town Clerk) [18972]	Object	OBJECTS to this site being classified as an UNREASONABLE RESIDENTIAL SITE Council strongly opposes the suggestion that this is an unreasonable site for residential development and fully supports its inclusion instead as a PREFERRED RESIDENTIAL SITE. For further info see additional info.	Consider additional info provided

## TAVERHAM (AND RINGLAND)

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	TAVERHAM AND RINGLAND OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	27
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	3 Support, 10 Object, 14 Comment

Taverham and Ringland has 1 Preferred Site, 1 Carried forward allocation, 1 Reasonable Alternatives site and 9 Unreasonable Sites.

### **Site GNLP0337 Land between Fir Covert Road and Reepham Road, Taverham (Preferred Site) 1, 400 dwellings**

Representations 16 (1 Support, 8 Object, 7 Comments)

#### Main Issues:

M Scott Properties Ltd / Bidwells Support On behalf of M Scott Properties Ltd (Scott Properties), we strongly support the preferred allocation.

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Drayton Parish Council Comment Drayton Parish Council would like to ensure that these facilities are available before 25% of the development is built.

Individuals / members of the public Objection Pleased to see access off Reepham Rd and Fir Covert Way and additional facilities included are noted. Neighbourhood Plan must be adhered to.

Main concerns are, scale of development, potential flooding, additional traffic on to the A140 and A1067 to Norwich particularly with Norwich Golf Club developments. Development should not commence until the western link is completed.

### **Site GNLP0159 Land adjacent to Beech Avenue Business Park, Ringland Road, Taverham (Reasonable Alternative Site)**

Representations 1 (1 Support, 0 Object, 0 Comment)

#### Main Issues:

Brown & Co Support The classification of this site as a reasonable alternative is supported. However, it is sought to promote part of this larger site for a small residential development of circa. 9 dwellings, to be considered as part of the review into settlement boundaries.

### **Site GNLP0062 Field at Taverham Road, Taverham (Unreasonable Residential Site)**

Representations 3 (0 Support, 0 Object, 3 Comment)

#### Main Issues:

Individuals Comment Residents delighted that the views of local residents have been taken into account and that site GNLP0062 has been deemed unsuitable for development for the reasons given.



**Site GNLP2051 151 Taverham Road, Taverham (Unreasonable Residential Site)**

Representations 5 (0 Support, 1 Object, 4 Comment)

Main Issues:

Individuals Comment Resident delighted that the views of local residents have been taken into account and that site has been deemed unsuitable for development.

Taverham Road Action Group Comment The members of Taverham Road Action Group (TRAG) agree that site GNLP2051 is totally unsuitable for development and fully support the decision to recommend that it should be rejected as a possible site, along with two other sites that have been put forward in relation to the south side of Taverham Road.

Individual Object to site being unreasonable. Further evidence provided to demonstrate new access, and other aspects.

**Site GNLP2106 South of Taverham Road, Taverham (Unreasonable Residential Site)**

Representations 1 (1 Support, 0 Object, 0 Comment)

Main Issues:

Individual Support the decision that site is an unreasonable alternative site, the proposed development would have had a detrimental effect on the Wensum Valley .

Sites not commented on through the consultation:

Unreasonable Residential Sites

- GNLP0457
- GNLP3039
- GNLP3040
- GNLP3043
- GNLP3045

## Taverham and Ringland – Preferred Site

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0337 Land between Fir Covert Road and Reephams Road, Taverham (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	16
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 8 Object, 7 Comments

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
M Scott Properties Ltd [10884] Bidwells (Mr Iain Hill, Partner) [16273]	Support	On behalf of M Scott Properties Ltd (Scott Properties), we strongly support the preferred allocation. The Site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils housing needs during the period to 2038.  The work undertaken to date is covered in more detail in the Delivery Statement prepared by Scott Properties and submitted in support of this representation See Appendix 1	Consider additional evidence on delivery etc. as part of policy wording revisions.
Anglian Water Services Ltd (Mr Stewart Patience, Spatial Planning Manager) [12528]	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.

<p>Drayton Parish Council (Mr Jonathon Hall, Clerk) [13333]</p>	<p>Comment</p>	<p>Drayton Parish Council would like to ensure more robust provision is included within the development so that these facilities are available before 25% of the development is built. The Parish Council would also like to ensure that no vehicular access is granted into the new development area from Felsham Way.</p> <p>Other concerns are: with increase in traffic numbers on Reepham Road towards Drayton and Hellesdon from the proposed vehicular access point from the new development. Suggests a for a left turn only exist to encourage the use of Broadland Northway, the Norwich Western Link and the soon to be delivered duelled A47.</p>	
<p>Individuals / members of the public</p>	<p>Objection</p>	<p>Pleased to see access off Reepham Rd and Fir Covert Way and additional facilities included are noted. Neighbourhood Plan must be adhered to.</p> <p>Main concerns are, scale of development, potential flooding, additional traffic on to the A140 and A1067 to Norwich particularly with Norwich Golf Club developments.</p> <p>Opposed to community facilities suggested for the purposes of further development.</p> <p>Development should not commence until the western link is completed.</p>	<p>Consider policy wording and Neighbourhood Plan</p>
<p>NPS Property Consultants Ltd (Mr Andy Scales, Head of Planning Consultancy) [14146]</p>	<p>Objection</p>	<p>Representing Norfolk Constabulary whose responsibility for policing and making Norfolk a safe place where people want to live, work, travel and invest in.</p> <p>Policy GNLP0337 will provide a very large urban extension at the edge of north west Norwich, the policy should also <b>include a new police station</b>. Therefore, the policy should be amended to include this requirement in requiring land to be safeguarded for provision of police station.</p>	<p>Consider proposal and policy wording if it can demonstrate to be viable and deliverable</p>

**Taverham and Ringland – Reasonable Alternative Site**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0159 Land adjacent to Beech Avenue Business Park, Ringland Road, Taverham (Reasonable Alternative Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	Support	The classification of this site is a reasonable alternative is supported. However, it is sought to promote part of this larger site for a small residential development of circa. 9 dwellings, to be considered as part of the review into settlement boundaries.	Consider as part of smaller site

**Taverham and Ringland – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0062 Field at Taverham Road, Taverham (Unreasonable Residential Site)
<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>
Individuals	Comment	Resident delighted that the views of local residents have been taken into account and that site GNLP0062 has been deemed unsuitable for development for the reasons given.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2051 151 Taverham Road, Taverham (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 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>
Individuals	Comment	Resident delighted that the views of local residents have been taken into account and that site has been deemed unsuitable for development.	
Taverham Road Action Group (Members of TRAG, Co-ordinators) [18007]	Comment	The members of Taverham Road Action Group (TRAG) agree that site GNLP2051 is totally unsuitable for development and fully support the decision to recommend that it should be rejected as a possible site, along with two other sites that have been put forward in relation to the south side of Taverham Road.	
Individual	Object	Objects to site being unreasonable. Further evidence provided to demonstrate new access, and other aspects.	Further evidence to be considered

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2106 South of Taverham Road, Taverham (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Individual	Support	Fully in support the decision that site is an unreasonable alternative site, the proposed development would have had a detrimental effect on the Wensum Valley .	



## THORPE ST ANDREW

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	THORPE ST ANDREW OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	3 Support, 2 Object, 0 Comment

Thorpe St Andrew has 0 Preferred Sites, 0 Carried Forward/Uplift Allocations, 0-Reasonable Alternative Sites and 5 Unreasonable Sites.

### **Policy Site GNLP0442 Racecourse Plantations, Plumstead Road East, Thorpe St Andrew (Unreasonable Residential Site)**

Representations 1 (1 Support, 0 Object, 0 Comment)

#### Main Issues:

Individual Support Considered unreasonable as it's a woodland that surround the East side of Norwich

**Policy Site GNLP2170 Langley North (Former Playing Fields/Langley School), Thorpe St Andrew (Unreasonable Residential Site)**

Representations: 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Barton Willmore Object Site benefits from outline planning approval for residential development, there is no evidence that development at this location would result in further deficiency of playing pitches.

**Site GNLP2171 Langley South (Former Langley School), Thorpe St Andrew (Unreasonable Residential Site)**

Representation 1 (0 Support, 1 Object, 0 Comment)

Main Issues:

Barton Willmore Site benefits from outline planning approval for residential development, there is no evidence that development at this location would result in further deficiency of playing pitches. See Full representation.

Sites not commented on through the consultation:

Unreasonable Residential Sites

- GNLP0228
- GNLP0540

**Thorpe St Andrew – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0442 Racecourse Plantations, Plumstead Road East, Thorpe St Andrew (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 0 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>
Individual 21787	Support	Considered unreasonable as it's a woodland that surround the East side of Norwich	Site was allowed under appeal

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2170 Langley North (Former Playing Fields/Langley School), Thorpe St Andrew (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Barton Willmore	Object	Site benefits from outline planning approval for residential development, there is no evidence that development at this location would result in further deficiency of playing pitches. See Full representation.	Check status with DM officers

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2171 Langley South (Former Langley School), Thorpe St Andrew (Unreasonable Residential Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 0 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>
Barton Willmore		Site benefits from outline planning approval for residential development, there is no evidence that development at this location would result in further deficiency of playing pitches. See Full representation.	Check status with DM officers

## TROWSE INCLUDING NON-RESI AT BIXLEY AND WHITLINGHAM

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	TROWSE INCLUDING NON-RESI AT BIXLEY AND WHITLINGHAM OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	7
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 5 Comment

Trowse (including Non-Resi at Bixley and Whitlingham) has 0 Preferred Sites, 1 Carried forward/ Uplift Allocation, 2 Reasonable Alternative sites and 0 Unreasonable sites.

### **Policy TROW1 - Land on White Horse Lane and to the rear of Charolais Close and Devon Way, Trowse (Carried forward Allocation)**

Representations 3 (0 Support, 1 Object, 2 Comment)

#### Main Issues:

Anglian Water Services Ltd Comment No reference to water efficiency forming part of design unlike other allocation policies.

Cornerstone Planning Ltd Comment TROW1-Given that Norfolk Homes' current application would increase the cumulative development of the site to 181 dwellings, request that: policy refers to 'at least 173 dwellings'

Historic England Object Suggested Change: Make specific mention of the need to conserve and where opportunities arise enhance the significance of the Trowse Conservation Area.

**Site GNLP3051 Land at junction of Loddon Road/Bungay Road, Bixley (Reasonable Alternative Site– Non-Residential – Park and Ride)**

Representations 2 (0 Support, 1 Object, 1 Comment)

Main Issues:

Individual Comment There are discrepancies between TROW2 not being carried forward for allocation of P&R in SNDC SA and suggested RA which may be allocated.

Individual Object Proposed Site is adjacent to their property and would object if it went ahead as it would devalue their property.

**Site GNLP3052 Land adjacent to Whitlingham Country Park (Reasonable Alternative Site – Non Residential)**

Representations 2 (0 Support, 0 Object, 2 Comments)

Main Issues:

Environment Agency Comment As a country park would be classed as water compatible development under Amenity open space, nature conservation and biodiversity then this would be an acceptable land use within the flood zones, including Flood Zone 3b, Therefore, it would be preferable if any associated built development is located within Flood Zone 1.

Crown Point Estate Comment The additional land at WCP should be safeguarded so that it can be called upon to support the additional population arising from new development in the locality. Formally safeguarding the site for leisure and open space purposes through policy will provide confidence in investment within the Park, to support this increasing demand.

Sites not commented on through the consultation:

- None

**Trowse (including non-resi at Bixley and Whitlingham) – Carried Forward Allocation**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Policy TROW1 Land on White Horse Lane and to the rear of Charolais Close and Devon Way, Trowse (Carried forward Allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 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>
Anglian Water Services Ltd	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2.	Consistent policy approach to water efficiency needed.
Cornerstone Planning Ltd	Comment	TROW1-Given that Norfolk Homes' current application would increase the cumulative development of the site to 181 dwellings, we would request that: <ul style="list-style-type: none"> <li>• The current planning application is acknowledged in supporting text (Notes);</li> <li>• The policy title refers to "at least 173 dwellings"</li> </ul>	Review carried forward policies with DM to be updated accordingly.
Historic England	Object	Suggested Change: Make specific mention of the need to conserve and where opportunities arise enhance the significance of the Trowse Conservation Area.	Review carried forward policies and wording accordingly



**Trowse (including non-resi at Bixley and Whitlingham) – Unreasonable Sites**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3051 Land at junction of Loddon Road/Bungay Road, Bixley (Reasonable Alternative Site– Non-Residential – Park and Ride)
<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>
Individual 22899	Comment	There are discrepancies between TROW2 not being carried forward for allocation of P&R in SNDC SA and suggested RA which may be allocated.	Check status and update accordingly
Individual 19972	Object	Proposed Site is adjacent to their property and would object if it went ahead as it would devalue their property.	

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3052 Land adjacent to Whittingham Country Park (Reasonable Alternative Site – Non Residential)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 2 Comments

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Environment Agency	Comment	As a country park would be classed as water compatible development under Amenity open space, nature conservation and biodiversity then this would be an acceptable land use within the flood zones, including Flood Zone 3b, Therefore, it would be preferable if any associated built development is located within Flood Zone 1.	Check masterplan and for any proposed build development.
Crown Point Estate	Comment	The additional land at WCP should be safeguarded so that it can be called upon to support the additional population arising from new development in the locality. Formally safeguarding the site for leisure and open space purposes through policy will provide confidence in investment within the Park, to support this increasing demand.	