

Greater Norwich Local Plan

Statement of Compliance with the duty to Cooperate – Draft

Greater Norwich Local Plan

Statement of Compliance with the Duty to Cooperate - DRAFT

Statement of Compliance with the Duty to Cooperate.....	1
1.0 Purpose.....	4
2.0 Introduction	4
3.0 The Strategic Context for the GNLP	6
Spatial Vision and shared objectives.....	9
Summary of Cooperation.....	10
The Norfolk Strategic Planning Framework (NSPF): Statement of Common Ground.....	10
NSPF Coverage – Parties Involved	11
The Norfolk Strategic Planning Officers Group (NSPG).....	13
Liaison with regional organisations	13
Greater Norwich Boards.....	14
4.0 Strategic Planning Issues, Joint Evidence Base and Cooperation with Duty to Cooperate Bodies.....	14
Housing	16
Strategic Planning Issue	16
Evidence Base	16
Strategic Partners (D to C).....	16
Summary of Evidence Studies	16
Outcomes set out in the NSPF.....	18
.....	18
Outcomes set out in the GNLP	19
Ongoing Cooperation	19
Outcomes set out in the GNLP	19
Ongoing Cooperation	19
Economy	20
Strategic Planning Issue:	20
Evidence Base	20
Strategic Partners D to C	20
Actions	20
Summary of Evidence (Cont.)	21
Outcomes set out in the NSPF.....	22
Outcomes set out in the GNLP	22

Greater Norwich Local Plan

Ongoing cooperation.....	23
Infrastructure/ Transport / Education / Utilities.....	24
Evidence Base	24
Strategic Partners D to C	24
NSPF: Norfolk County Council (NCC), Network Rail, Highways England	24
Actions	24
Summary of Evidence Base	24
Outcomes set out in the NSPF.....	26
Outcomes set out in the GNLP	27
Outcomes from strategic working in the NSPF and the GNLP	28
Education	28
Outcomes set out in the NSPF and the GNLP	29
Ongoing Cooperation	29
Health.....	30
Evidence Base	30
Strategic Partners (D to C).....	30
Actions	30
Outcomes set out in the NSPF.....	31
Outcomes set out in the GNLP	31
Ongoing cooperation.....	32
Climate Change: including Flood Risk / Water / Energy Efficiency	33
Evidence Base	33
Strategic Partners	33
Summary of Evidence Base	33
Outcome set out in the NSPF 2021	35
Outcome set out in the GNLP	36
Ongoing cooperation.....	37
Natural Environment	38
Evidence Base	38
Strategic Partners D to C	38
Actions	38
.....	39
NSPF 2021 coverage.....	40
GNLP coverage	40
Ongoing cooperation.....	41

Greater Norwich Local Plan

Historic Environment	42
Strategic Planning Issue	42
Evidence Base	42
Strategic Partners D to C	42
Actions	42
GNLP Coverage.....	42
Ongoing cooperation.....	43
5.0 Conclusions	44
Appendix 1 Norfolk Strategic Planning Framework (NSPF): Shared Spatial Objectives for Growing County and Statement of Common Ground (SCG) (2021) Agreements	48
Appendix 2 - Norfolk Strategic Planning Framework (NSPF): Shared Spatial Objectives for a Growing County and Statement of Common Ground (SCG) (2019) - Agreements	54
Appendix 3 – Emails Confirmations (extracts) - D to C – Prescribed bodies 58	
Babergh District Council & Mid Suffolk District Council.....	58
Broads Authority	60
Civil Aviation Authority (CAA).....	63
Environment Agency	65
Health (STP)	69
Historic England	73
Homes England	76
Natural England	78
Office of Rail and Road (ORR).....	81
Suffolk County Council.....	83
East Suffolk.....	85
Great Yarmouth Borough Council	87
King’s Lynn and West Norfolk	88
Breckland District Council – (confirmation awaited)	90
Highway England – (confirmation awaited)	91
Appendix 4 - Statement of Common Ground with Wild Anglia (in progress) 93	
Appendix 5 - Statement of Common Ground with Marine Management Organisation (MMO) (in progress)	94
Appendix 6 – Statement of Common Ground with Breckland DC (in progress)	95

Greater Norwich Local Plan

Summary

This statement shows that the Greater Norwich Local Plan (GNLP) is compliant with the Duty to Cooperate in accordance with planning legislation and guidance.

1.0 Purpose

- 1.1 This statement provides justification and explanation of how the GNLP has complied with the Duty to Cooperate (D to C) on strategic matters in accordance with national legislation and guidance as part of its preparation and for its consideration at examination. It is written as a “draft” document that sets out the situation at the present time, at the point of submission of the Plan. This will be updated, as necessary, with further information as this becomes available.

2.0 Introduction

- 2.1 Section 110 of the Localism Act 2011 places a legal duty on local planning authorities (LPAs) to cooperate with neighbouring authorities, county councils and other prescribed bodies when planning for sustainable development.
- 2.2 The additional prescribed bodies with which local planning authorities are required to cooperate are set out in Regulation 4 of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The applicable bodies are:
- The Environment Agency;
 - English Heritage (now Historic England);
 - Natural England;
 - Local Nature Partnerships (Wild Anglia in Greater Norwich);
 - The Civil Aviation Authority;
 - The Homes and Communities Agency (now Homes England);
 - NHS Primary Care Trusts (these were abolished and replaced by NHS Clinical Commissioning Groups (CCGs) on 1 April 2013);
 - Office of the Road and Rail Regulator (ORRR);
 - Highways Agency;
 - Highway Authorities (Norfolk County Council for Greater Norwich);
 - The Marine Management Organisation (MMO).
- 2.3 The D to C is referenced in Section 33A of the Planning and Compulsory Purchase Act 2004, which defines the duty and sets out its general requirements, and sub-section (c) to Section 20(5) of that Act, which sets out the purposes of independent examination of development plan documents. Complying with the duty is integral to the independent examination process.

Greater Norwich Local Plan

2.4 The Duty:

- relates to sustainable development or the use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
- requires that councils set out planning policies to address such issues;
- requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies;
- requires councils to consider joint approaches to plan making.

2.5 The National Planning Policy Framework 2019 (NPPF) paragraphs 24 – 27 set out how LPAs and county councils (in two tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 25 states that these strategic policy making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, and infrastructure providers.

2.6 Furthermore, paragraph 26 states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

2.7 Also, in order to demonstrate effective and on-going joint working, strategic policy making authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process. Local planning authorities are also bound by the statutory D to C as stated in paragraph 27.

2.8 [Neighbourhood Planning bodies](#), and town and parish councils are **not bound** by the D to C, nor are they required to produce or be involved in a statement of common ground.

2.9 Further to the above, Planning Practice Guidance paragraph 009 states that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local

Greater Norwich Local Plan

plans (including minerals and waste plans), spatial development strategies and marine plans.

2.10 Paragraph 156 of the NPPF (2019) defines the strategic priorities which should be addressed in local plans as:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management;
- water supply, wastewater, flood risk and coastal change management;
- minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

3.0 The Strategic Context for the GNLP

3.1 The GNLP identifies the strategy for growth in the first part of the plan, the GNLP Strategy. The sites to deliver the strategy are in the second part of the plan, the GNLP Sites document. It will run from 2018 to 2038 when adopted. Figure 1 below shows the geographical area the GNLP covers.

3.2 The production of the joint GNLP by the three authorities, Broadland District Council, Norwich City Council and South Norfolk Council working with Norfolk County Council and the Broads Authority, through the Greater Norwich Development Partnership, demonstrates a very high degree of cooperation. As partners in the GNDP, Norfolk County Council and the Broads Authority have been actively involved in the production of the plan at an officer and member level. As such they have been fully engaged in the plan including in respect of the D to C, and there are no unmet D to C issues.

3.3 This approach follows on from the Joint Core Strategy (JCS) (2011 and 2014) which was produced jointly by the same authorities. The JCS, along with adopted Site Allocations Plans, Area Action Plans (AAPs) for the Growth Triangle, Long Stratton and Wymondham and Neighbourhood Plans in each of the three districts, already set out where a high proportion of the housing (74%) and jobs growth required by the GNLP will be located.

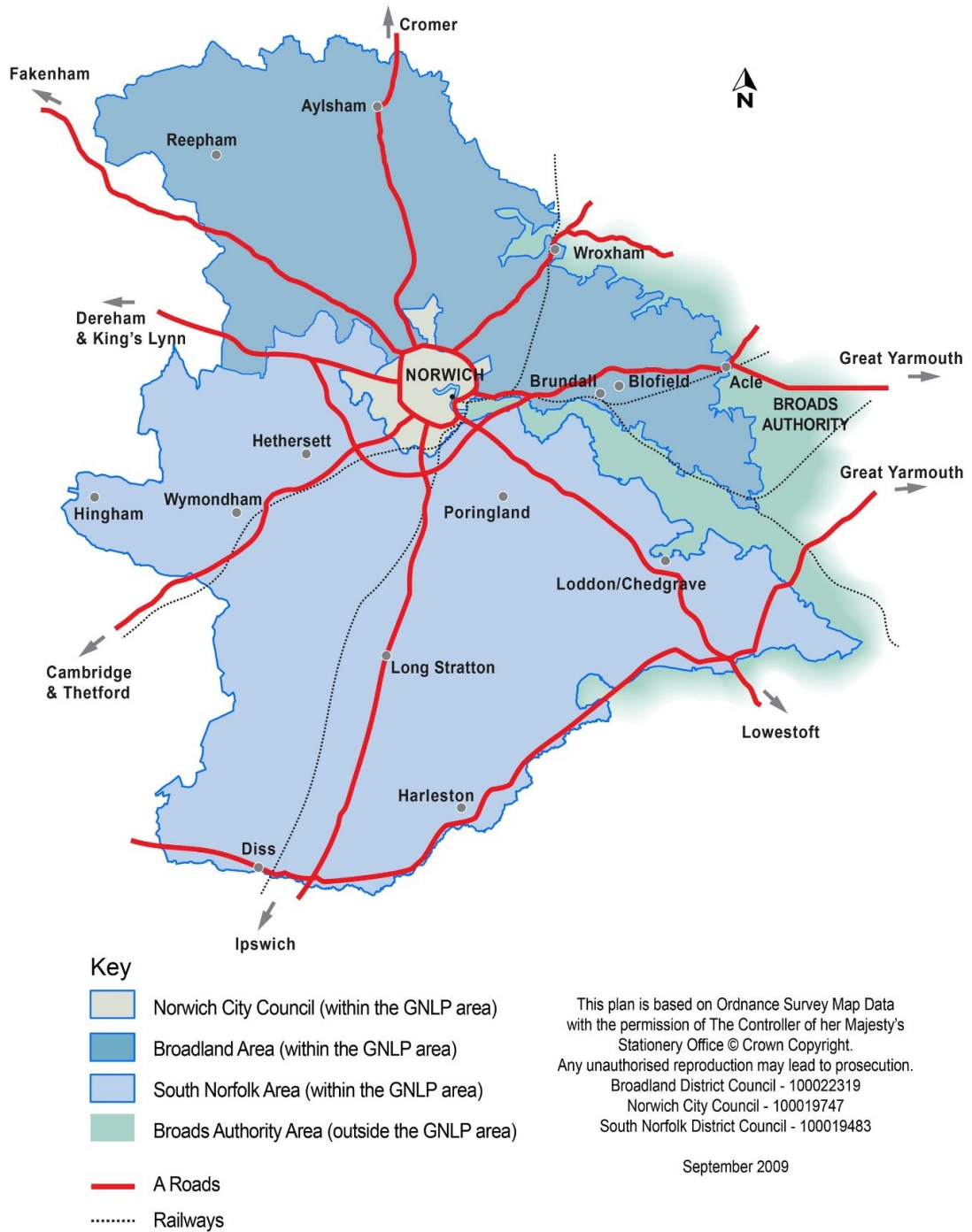
3.4 The GNLP will supersede the current JCS and the Site Allocations Plans in each of the three districts, except for the smaller villages in South Norfolk in which residential site allocations will be addressed through a new South Norfolk

Greater Norwich Local Plan

Village Clusters Housing Allocations Local Plan and the Diss, Scole and Burston area, for which a Neighbourhood Plan is being produced which will allocate sites. The great majority of the undeveloped sites in the Site Allocations plans are re-allocated through the GNLP. The GNLP will be used to help to assess planning applications by providing up-to-date policies to guide development in rapidly changing times whilst meeting Government requirements set out in the National Planning Policy Framework (NPPF) (2019 and 2021).

Greater Norwich Local Plan

Figure 1 The GNLP Area



3.5 The GNLP both continues and adds to the long-term and successful approach set from the second decade of the century in the JCS and provides an excellent basis for the new approach to strategic planning that the Government has signaled that it intends to introduce.

Greater Norwich Local Plan

- 3.6 As part of the duty to cooperate and reflected through the production of the 2019 and 2021 versions of the Norfolk Strategic Planning Framework (NSPF – see Paragraphs 3.12 to 4.1 below for further details) several proposed shared objectives and agreements have been reached about the geographical area over which it was most appropriate to prepare local plans within Norfolk, the period to be planned for, and how each plan will provide at least the minimum number of dwellings required over the agreed period. In reaching these agreements, the authorities have had regard to the needs which may arise from outside the county and have collectively agreed a process for establishing each area’s capacity to accommodate growth whilst following national planning guidance in the NPFF. As a result, several joint studies have been produced to provide a better understanding of strategic issues, detailed policy guidance and provide efficiencies.
- 3.7 Most significantly for the D to C and in line with agreement 10 of the Norfolk Strategic Planning Framework (NSPF 2019), and more recently agreement 11 of NSPF 2021, Greater Norwich should provide for at least its local housing need (LHN) within its boundaries unless this would result in unsustainable development. Work on the GNLP has shown that this housing growth can be provided for within Greater Norwich in sustainable locations.

Spatial Vision and shared objectives

- 3.8 At the local level, the district councils’ visions, objectives, priorities and ambitions have influenced the GNLP strategy, including through the GNLP Vision and Objectives. These documents are the Norwich City Vision 2040 and Broadland and South Norfolk’s Our Plan 2020 to 2024.
- 3.9 The GNLP vision and objectives also reflect the [NSPF 2021’s](#) shared objectives and Agreement 3 – which states that cooperation between Local Authorities and the preparation of Development Plans will seek to:
- strengthen the economy,
 - respond to climate change,
 - address housing needs,
 - improve quality of life and health,
 - improve and conserve Norfolk’s rich and diverse environment.,
- 3.10 These shared objectives covering strategic issues have informed the content of the GNLP. This particularly applies in relation to strategic infrastructure, meeting housing and employment needs, the health protocol, water quality and efficiency, flood prevention, protecting and enhancing the natural environment through new and improved Green Infrastructure and visitor pressure on habitats protected under the Habitats Regulations.

Summary of Cooperation

3.11 The Greater Norwich authorities have worked with a wide range of bodies and stakeholders in producing the GNLP. The sections below demonstrate how strategic issues have been addressed, starting with the primary means through which the Duty to Cooperate has been addressed, the NSPF. The NSPF is a regularly updated Statement of Common Ground for Norfolk authorities on strategic cross-boundary matters. More specific topic-based work associated with or outside the NSPF is also discussed below.

The Norfolk Strategic Planning Framework (NSPF): Statement of Common Ground

3.12 Norfolk's LPAs (including Norfolk County Council) have a long track record of working together to achieve shared objectives. In early 2015 the strategic planning member forum agreed to formally cooperate on a range of strategic cross-boundary approaches to strategic infrastructure, housing and jobs numbers and common policy approaches through the preparation of the NSPF. The first iteration of the NSPF was endorsed in October 2019. The revised version was endorsed by the partners in spring 2021.

3.13 The first version of the NSPF (2019) set out 25 agreements (see Appendix 2). The agreements reflected the revisions to the NPPF made in 2019 including the requirement to apply a new standardised methodology to assessing housing need and to produce statements of common ground.

3.14 The NSPF (2021) sets out thirty joint agreements (see Appendix 1) to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of local plans;
- Demonstrate compliance with the duty to co-operate and consistency with the revisions to the NPPF made in 2019;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence high-level plans (such as the New Anglia LEP's Economic Strategy, the Local Industrial Strategy, the Covid 19 Recovery Start Plan) and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

3.15 The updates in 2021 sought to ensure the NSPF is up to date with all relevant information and legislation. The document has been updated after the completion of a number of county wide studies looking at:

- Green infrastructure and recreational avoidance and mitigation and the introduction of a county wide tariff to mitigate against the impact on existing Natura 2000 sites;

Greater Norwich Local Plan

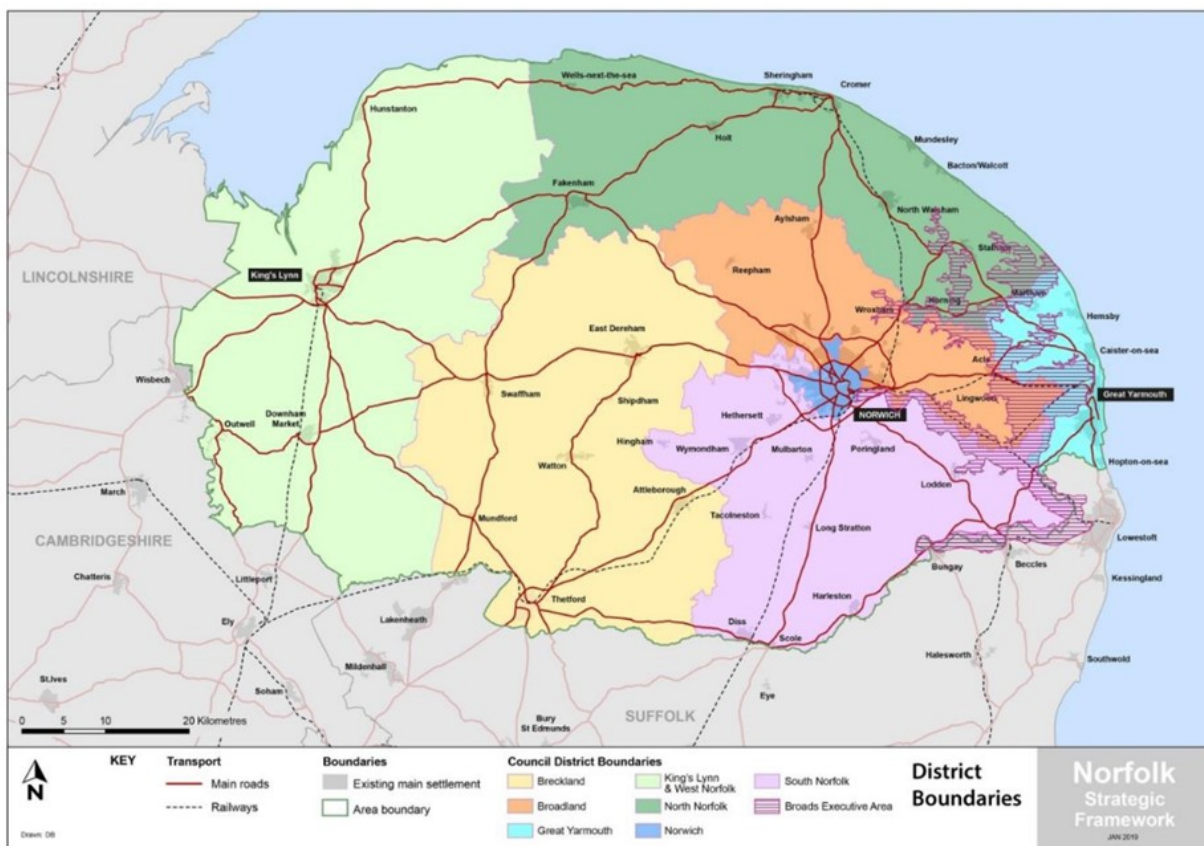
- The housing needs of the elderly and the types of accommodation required;
- The actions that LPAs can take to help mitigate and adapt to climate change;
- A new health section to highlight the importance of health provision and healthy living as a strategic cross boundary issue;
- Shared guidance on the role out of 5G and to help improve fibre broadband connectivity;
- Updates to take account of new information.

NSPF Coverage – Parties Involved

3.16 There are seven separate district councils in Norfolk which are LPAs – Norwich City Council, Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council and South Norfolk Council. In addition, the Broads Authority is the LPA for their area (see Figure 2 below).

Greater Norwich Local Plan

Figure 2 Local Planning Authorities covered in NSPF



3.17 Norfolk County Council is the local planning authority responsible for minerals and waste planning and highways, as well as certain operational development related to their functions (most notably for educational development).

Working arrangements

The Member Forum

3.18 In January 2014 the [Norfolk Strategic Members Forum](#) was established with the overall purpose of ensuring that the requirements of the Duty were met, subsequently leading to overseeing the production of the NSPF. The forum comprises of two members from each of the Norfolk district councils and the Broads Authority together with Norfolk County Council (the 'Core Group') which meet quarterly. They are supported by the **Norfolk Strategic Planning Officer Group (NSPG)** (see below) which meets on a monthly basis to progress strategic matters under the D to C.

3.18 The forum's overall purpose is to ensure that the requirements of the D to C when preparing development plans are discharged in a way which enhances

Greater Norwich Local Plan

the coverage of strategic planning matters and minimises the risk of unsound plans. It provides the political input and steerage necessary to discharge the Duty. Although the forum is not a decision-making body, it recommends actions to partner authorities, aiming to reach a consensus where possible. Its recommendations are not binding on the actions of any of the partners.

- 3.19 A number of working groups recently updated the NSPF. These groups consist of local authority staff assisted by other organisations including the Environment Agency, Natural England, NHS Sustainability and Transformation Partnership (STP), Anglian Water, UK Power Networks and the New Anglia Local Enterprise Partnership.
- 3.19 For further information on the work of the Norfolk Strategic Planning Member Forum and about the process for updating this framework including the minutes of the meetings available on the Norfolk County Council's website please see the forum's website: www.norfolk.gov.uk/nsf
- 3.20 Through the NSPF, all Norfolk LPAs have agreed to plan to at least 2036 in their emerging local plans. This is reflected in the evidence base for the framework which provides statistical information for this period as well as in the agreement made shown in Appendix 1 and 2. This is also the date by when objectives are to be achieved, though in parts, notably the vision, the document takes a longer-term view.
- 3.21 Importantly, the NSPF, along with agreements with neighbours in Suffolk, states that LPAs (with the exception of the Broads Authority) will provide for their own housing and jobs growth needs within their own boundaries, strengthen the economy, respond to climate change, address housing needs, aim to improve quality of life and health, improve and conserve Norfolk's rich and diverse environment and work jointly to maximise the opportunities to secure external funding to deliver against agreed objectives.

The Norfolk Strategic Planning Officers Group (NSPG)

- 3.22 The NSPG supports the Member Forum. It consists of planning policy officers from each LPA in Norfolk, the County Council and the Environment Agency, as well as other disciplines and key statutory agencies which attend meetings as appropriate. The group reviewed the progress of NSPF updating on a monthly basis, ensuring that the document progressed to the timetable and meets any government and legislative requirements. Meetings will remain ongoing.

Liaison with regional organisations

- 3.23 A representative of the NSPG sits on the regional Strategic Spatial Planning Officer Liaison Group (SSPOLG) which supports planning cooperation across

Greater Norwich Local Plan

the wider South East (East of England, Greater London and South of East of England).

- 3.24 In addition the Cambridge – Norwich Tech Corridor initiative brings together business and political leaders to amplify the region’s existing, collective strengths in science, technology and create a place where people and business can thrive. Its work has informed the content of both the LEP’s strategic approach and the GNLP. As such, it is an excellent example of cooperation at the regional scale.

Greater Norwich Boards

- 3.25 The Greater Norwich Growth Broad (GNGB) oversees the implementation of the infrastructure investment programme across Greater Norwich for growth planned through the JCS. It is led by member level board including the Chair of the New Anglia LEP. The board is supported by a Director’s group, dedicated staff and officer level groups including planning policy officers. Through the provision of the Greater Norwich City Deal and efforts from the GNGB, programme delivery has been successful. Infrastructure constraints on future development have eased considerably in recent years. The programme is drawn together from the Joint Five-year Infrastructure Investment Plan and identifies schemes to be prioritised for delivery within each financial year.
- 3.26 The Greater Norwich Development Partnership (GNDP) provides political guidance to the joint planning team for the plan-making process for GNLP. The partnership consists of representatives from the three Greater Norwich authorities, Norfolk County Council and the Broads Authority. At senior officer level, the Greater Norwich Infrastructure Delivery and Planning Board (GNIDPB) serves both the GNDP and GNGB. Membership of this Director’s Board consist of representatives of all four councils, the LEP and the Broads Authority.

4.0 Strategic Planning Issues, Joint Evidence Base and Cooperation with Duty to Cooperate Bodies

- 4.1 This section sets out on a thematic basis how the Greater Norwich authorities have sought to address the strategic priorities listed in NPPF 2019 and 2021 paragraphs 20. In some cases, the tables show how partnership working in addition to the work undertaken through the NSPF Statement of Common Ground has provided evidence on strategic matters. The tables also set out, in brief, how the NSPF and other evidence on strategic cross-boundary issues has informed the content of the GNLP on the key themes. Some additional evidence studies have included collaboration with bodies prescribed under the D to C. The evidence, which has been updated where required as plan-making has progressed, is highlighted in the tables below. It is also worth noting that evidence has also been subject to public consultation and the comments

Greater Norwich Local Plan

received have been considered (see the Consultation Statement for more information).

- 4.2 The publication of the pre-submission version of the GNLP has highlighted the need for further engagement on some aspects of plan policies raised through representations from the D to C bodies. Where relevant, the GNLP has been working with, and will continue to liaise on agreeing Statements of Common Ground to provide clarity on the issues raised for the examination and to provide resolutions where possible as referenced in the tables below.

Housing

Strategic Planning Issue

Meeting Housing Need including affordable housing and Gypsy and Traveller Accommodation – Setting the scale, distribution and location of housing and addressing housing need for the Greater Norwich authorities as well as neighbouring local authorities

Evidence Base

- [NSPF \(2019\) and NSPF \(2021\)](#)
- [HELAA Addendum III \(Dec 2020\)](#) (2.62 MB)
- [HELAA Addendum II \(January 2020\)](#) (1.30 MB)
- [HELAA Addendum I \(October 2018\)](#) (3.86 MB)
- [Housing and Economic Land Availability Assessment \(HELAA\) \(December 2017\)](#) (4.48 MB)
- The Greater Norwich Housing Needs Assessment (HNA) (2021),
- [Strategic Housing Market Assessment \(SHMA\) \(2017\)](#) and its [supplementary note](#)
- [Gypsy and Travellers Addendum \(November 2020\)](#) (253.97 KB)
- [Caravans and Houseboats Study \(October 2017\)](#) (1.79 MB)

Strategic Partners (D to C)

SHMA: Norfolk County Council, Breckland District Council, North Norfolk DC, Broads Authority

HELAA: Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council

HNA:

Caravans and Houseboats Study: South Norfolk, Broads Authority, Norwich City Council, Norfolk County Council, Broadland DC, North Norfolk DC, Great Yarmouth BC. Consultations with: King's Lynn and West Norfolk, Mid Suffolk, and Waveney

Gypsy and Travellers Addendum: Broadland DC, Norwich CC and South Norfolk DC

Summary of Evidence Studies

Strategic Housing Market Assessment (SHMA) (2017)

The overall housing requirement of the GNLP is based on the Government's standard methodology. It is supported by evidence from the Strategic Housing Market Assessment SHMA (2017). The study was jointly commissioned by the five Central Norfolk local authorities to provide a consistent evidence base for housing across Central Norfolk area and to demonstrate that they had effectively cooperated with adjoining authorities on meeting development requirements. The study built on the work of the Central Norfolk SHMA (2015) which was jointly commissioned by Norwich City, Broadland, Breckland and North Norfolk, together with the Broads (with Norfolk County Council also a non-commissioner partner).

The Greater Norwich Housing Needs Assessment (HNA) (2021)

The Greater Norwich Housing Needs Assessment (HNA) 2021 update was commissioned to take account of any Covid19 impacts and to support the submission and examination of the GNLP. The local HNA complies with the requirements of NPPF 2019 paragraph 61 and NPPF 2021 paragraph 62, as well as with planning practice guidance. It brings together and integrates new data with the more recent evidence studies supporting the GNLP to provide an up to date assessment of size, type and tenure covering the full range of housing requirements. The study confirms that the existing evidence on housing policies in the GNLP remain valid with headlines that:

- The 33% (28% in the city centre) target for affordable housing in the GNLP is appropriate;
- To be based on the latest information, the study recalculates overall housing need using the Government's standard methodology with 2021-release affordability data. This suggests a housing need of 39,440 in the plan period which helps to demonstrate that the housing requirement in the plan of 40,541 is appropriate, supports economic growth and should not be increased.

Norfolk Caravans and Houseboats Accommodation Needs Assessment Including for Gypsies, Travellers and Travelling Show people (2017) and Gypsy and Travellers Addendum (2021)

The Accommodation Needs Assessment (ANA) (2017) assessed the supply and accommodation needs of Gypsies and Travellers, Travelling Show People, residential boat dwellers and residential caravan dwellers within the Greater Norwich, along with the Broads Authority, North Norfolk and Great Yarmouth, for the period 2017-2036.

For more information see the Homes Topic Paper.

The Greater Norwich Accommodation Need and Supply Changes Study (ANA 2021). This addendum by RRR Consultancy, published in January 2021, explains how planning permissions granted have impacted on the supply and updates the need over the plan period as: 64 pitches for Gypsies and Travellers, 48 plots for Travelling Show people, and 108 pitches for residential caravan dwellers. The accommodation needs for boat dwellers identified in the 2017 ANA has been allocated to the Broads Authority as they are responsible for the main waterways in the area (hence no need listed above for boat dwellers within the Greater Norwich area). At the time of writing, further work is being undertaken to update this evidence of need.

Greater Norwich Local Plan

Norfolk Housing and Economic Land Availability Assessment (HELAA) (2018-20)

The Housing and Economic Land Availability Assessments (HELAAAs) are key evidence documents which support the preparation of local plans. As part of the D to C, they use a consistent methodology across all of the planning authorities in Norfolk.

HELAAAs establish how much suitable development land is available in any area and how much growth can be accommodated as a result. The Norfolk HELAA has provided the evidence to show that the district LPAs in the county can meet their own growth needs in their own areas (as set out in Agreement 11 of the NSPF 2021). The HELAA has also been used in the Norfolk local plans including the GNLP to assist the site selection process by helping to identify the most suitable sites for further assessment and finally allocation. As part of the HELAA Assessment a number of key organisations have contributed to this work such as: Anglian Water, Highways England, Norfolk Wildlife Trust, Norfolk Historic Environment, Norfolk Ecology, Conservation Dept from BDC, SNDC and NCC, Highway Authority, Environmental Services, Children Services, LLFA, NCC Minerals and Waste.

The approach taken by the GNLP on the use of the HELAA is in accordance with NSPF (2021) Agreement 16 (see below).

Outcomes set out in the NSPF

The NSPF, along with agreements with neighbours in Suffolk, states that Greater Norwich will provide for all its housing and jobs growth needs within its own boundaries as will its neighbours. It also states that Greater Norwich City Deal growth requirements, as agreed with Government, will be met through the GNLP. The NSPF and work with Suffolk authorities meets the Government's requirement for a Statement of Common Ground and the "Duty to Co-operate" on housing. The most relevant NSPF 2021 Agreements are below:

Agreement 4 – To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Greater Norwich Local Plan

Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Outcomes set out in the GNLP

- The plan provides for all of Greater Norwich's housing growth needs within its own area and does not provide for overspill from neighbouring districts as this has not been necessary;
- The plan sets 33%/28% (in the city centre) targets for affordable housing. Evidence updates in 2021 have verified that these are appropriate;
- The housing requirement in the plan of 40,541 is appropriate and supports economic growth and should not be increased;

Homes policy 5 provides for the housing needs of different parts of our community including Gypsies and Travellers, students and older people.

Ongoing Cooperation

The Greater Norwich authorities continue to work cooperatively with neighbouring authorities on strategic housing issues as part of the ongoing Norfolk Strategic Planning Framework and the Norfolk Strategic Member Forum. The Greater Norwich authorities will continue to work with the other Central Norfolk authorities in the future to consider reviewing the HNA. The Greater Norwich authorities will also continue to participate as a member of the Norfolk and Suffolk Gypsy Roma and Traveller Forum.

Economy

Strategic Planning Issue:

Delivering sustainable economic growth: Planning for the jobs needed in Greater Norwich and the wider area, allocating employment land and working cooperatively to drive economic growth.

Evidence Base

[Norfolk and Suffolk Economic Strategy](#)

[Local Industrial Strategy - New Anglia LEP \(in production\)](#)

[Cambridge Norwich Tech Corridor](#)

[Greater Norwich: Town Centres & Retail Study and Town Centre Study \(2017\) and Addendum \(2020\)](#)

[Employment Land Assessment Addendum \(2020\)](#)

[Greater Norwich Infrastructure Needs Report \(2020\)](#)

Strategic Partners D to C

Norfolk and Suffolk Economic Strategy: Babergh and Mid Suffolk Councils, Breckland District Council, Broadland District Council, Forest Heath District Council, Great Yarmouth Borough Council, Ipswich Borough Council, Norfolk County Council, Norwich City Council, North Norfolk District Council, South Norfolk Council, St Edmundsbury Borough Council, Suffolk Coastal District Council, Suffolk County Council, Waveney District Council, West Norfolk Council.

Actions

Regional Economic Strategies

Regional strategies and initiatives include the New Anglia Local Enterprise Partnership's existing Norfolk and Suffolk Economic Strategy (NSES), the emerging Norfolk and Suffolk Local Industrial Strategy, which builds on the NSES, and the Cambridge Norwich Tech Corridor initiative. The Cambridge Norwich Tech Corridor is a key element of both LEP strategies and links to other significant growth corridors: London-Stansted-Cambridge and the Cambridge - Milton Keynes-Oxford Arc (CaMkOx).

Summary of Evidence (Cont.)

East of England Forecasting Model (EEFM).

The EEFM has provided consistent economic forecasts annually for a range of partners including the New Anglia LEP, Norfolk CC, the NSPF, Greater Norwich and individual districts across the East of England. It therefore provides coverage for all the areas within and surrounding Greater Norwich, supporting cross boundary cooperation on strategic matters and the setting of benchmark figures to monitor performance. It also provides a robust evidence for fund bidding. The EEFM is overseen by a steering group of officers from upper tier authorities and the LEPs from the model area. It is prepared by the independent forecasting house Cambridge Economics.

Greater Norwich: Town Centres & Retail Study and Town Centre Study (2017) and the [Greater Norwich Town Centres & Retail Study Update \(2020\)](#)

GVA consultancy completed the Employment, Retail and Town Centre Study in 2017. It is underpinned by the base forecast provided by the EEFM. Avison Young was commissioned to update this work in 2020 in the form of two addendum reports covering jobs growth, employment land need, town centres and retail. The addendum reports took account of the ongoing impacts of COVID-19, the uncertainty of Brexit and the major changes to the planning system, concluding that the policies in the GNLP remain appropriate.

The Greater Norwich Infrastructure Needs Report states that economic growth evidence suggests that the Greater Norwich economy has grown by around 20,000 jobs since 2008 (the JCS base date) and 30,000 since 2011 (the low point after the recession).

It also states that Greater Norwich is worth over £10 billion (Gross GVA 2013 prices) to the UK's economy with key sectors which include; life sciences and biotech; advanced manufacturing and engineering; agriculture, agri-tech and food & drink; ICT, technology creative and digital; visitor, economy, tourism and culture; and financial, services and insurance.

Furthermore, the study states that local evidence has shown that the total amount of allocated and permitted employment land is more than sufficient to provide for expected and promoted growth. This includes a local need for some new small-scale allocations to provide for jobs growth in towns and villages, providing local job opportunities and support a vibrant rural economy also reflected in the Site Allocations section of the GNLP.

Outcomes set out in the NSPF

The use of the EEFM forecasting modelling has assisted the setting of consistent housing and jobs targets through Norfolk's local plans by providing agreed baseline figures and growth projections.

NSPF Agreement 9 – NSPF table 7 lists the Tier One Employment sites. It states the main employment uses on specific sites that should be the focus of investment to drive sustainable economic development in key sectors and that such sites should be protected from loss to other uses.

All of the Tier 1 sites in Greater Norwich are in Greater Norwich's part of the Cambridge Norwich Tech Corridor. In addition, all three of the Tier 1 sites in the neighbouring Breckland area (Attleborough, Snetterton and Thetford Enterprise Park) are in the growth corridor.

The NSPF also outlines in section 5.4 Key Cross-Boundary Economic Issues and Interventions:

- That the Norwich urban area and its hinterland is a major regional centre and draws trade from an extensive catchment across Norfolk and the wider region. This forms part of the strong cross boundary functional economic relationships within Norfolk
- The importance of the Cambridge Norwich Tech Corridor to "*maximise the economic benefits of this high-quality location with its world class universities, research institutes and business clusters*" and the A47 east-west corridor.

Accordingly, **NSPF agreement 10** states that local plans will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Outcomes set out in the GNLP

Policy 1 The Sustainable Growth Strategy - in line with the findings of the EEFM, the GNLP sets an overall target for job growth of 33,000 jobs from 2018 to 2038 and provides for 360 hectares of employment land.

In line with NSPF agreements 9 and 10, the policy also defines the Tier 1 Employment Sites from the NSPF as the 10 strategic employment locations for Greater Norwich. These are all located in the Strategic Growth Area which the Key Diagram of the GNLP defines. This forms Greater Norwich's part of the Cambridge Norwich Tech Corridor.

Supporting and demonstrating a link to nationally significant growth corridors will assist in attracting inward investment and accessing funding opportunities as government funding. This will assist in progressing the strategic cross boundary employment growth promoted through LEP strategies.

Policy 6 The Economy (including Retail) - identifies in greater detail the types of economic sector growth anticipated in each strategic employment area. It also identifies key retail locations, setting out the sequential approach for retail development as per government guidance. Since Norwich City Centre serves a significantly wider hinterland than Greater Norwich and other centres serve parts of neighbouring districts, retaining vitality in a rapidly changing retail environment is a strategic cross boundary issue.

Ongoing cooperation

Cooperation will be ongoing through future reviews of the NSPF, the GNLP and other plans and programmes in the wider area. This will include continued cooperation between the Greater Norwich authorities and Breckland District Council on promoting economic synergies (see Appendix 3 and 6). Implementation of the strategic employment locations identified as tier 1 employment sites in the Cambridge Norwich Tech Corridor in agreement 9 of the emerging NSPF and in local plans in Breckland and Greater Norwich will be the priority for co-operative work between the authorities.

Infrastructure/ Transport / Education / Utilities

Strategic Planning Issue-Provision of strategic infrastructure required to serve growth, through supporting transport plans and projects and agreements with other organisations.

Evidence Base

NSPF

GNLP [Infrastructure Needs Report \(2019\)](#)

GNLP [Infrastructure Needs Report \(2020\)](#)

Strategic Partners D to C

NSPF: Norfolk County Council (NCC), Network Rail, Highways England

Norfolk Infrastructure Needs Study: Fire Department, the NHS (Strategic Transformation Panel (STP)), Active Norfolk, NCC Children's services (education), NCC Green Infrastructure Team, Norfolk Constabulary, Broadband for Norfolk, UK Power Networks, EDF Energy, Anglian Water, NCC as the Lead Local Flood Authority, the Environment Agency.

HELAA: Norfolk County Council: Highway Authority, Education, LLFA, M&W, Children Services, Anglian Water .

Actions

NCC, the local highways authority which produces transport plans for the area, is also a partner in the production of the GNLP as well as the NSPF. As a result, the NSPF, as a strategic document, supports improvements to the railway and road network in Greater Norwich and the rest of Norfolk (see section 7.7, starting on page 65).

Planned Highways England trunk road improvements in Greater Norwich on the A47, including the junction with the A11, which will assist bringing forward GNLP allocated sites, are also referenced in this document. Partnership working with Network Rail and service providers on improved services from Norwich to Cambridge and London are also referenced in the NSPF.

Norfolk County Council: Highway Authority, Education, LLFA, M&W, Children Services, Environment, and Historic Environment all contributed to the HELAA and the Site selection process, which assisted in formulating the Site policies.

Summary of Evidence Base

Transport priorities which influence the GNLP are set out in several other strategies including: the Norfolk Local Transport Plan; the Norwich Area Transportation Strategy; the emerging Transport for Norwich Strategy and Transforming Cities. These are in addition to national and regional rail and road investment strategies and programmes. See GNLP Strategy Appendix 1- Infrastructure Requirements.

Greater Norwich Local Plan

Network Rail and Highways England have provided supportive responses to consultations on the GNLP and have not stated that there are any strategic cross boundary issues which have been excluded from the plan. The Office of the Road and Rail Regulator was consulted at the Regulation 18 draft plan stage in early 2020, but did not respond and has not responded to more recent contact (see Table 1 and appendix 3). In the light of the above information, the GNLP have cooperated directly with these bodies.

[The GNLP Infrastructure Needs Study \(2019\)](#) identified the infrastructure requirements within the Greater Norwich area to ensure the growth planned through the GNLP is sustainable. The report sets out an overview of existing infrastructure in the area by type, along with timings, costs and sources of funding for infrastructure improvements required to serve the planned growth. This considered a number of infrastructure plans and strategies produced externally.

Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences.

As part of the study, Norfolk County Council officers on behalf of the GNLP consulted internally with officers from the Lead Local Flooding Authority section, Children's services (education) and the Green Infrastructure team. NCC officers also consulted with other agencies such as the Fire Department, the NHS (STP), Active Norfolk, Norfolk Constabulary, Broadband for Norfolk, UK Power networks, EDF Energy, Anglian Water and the Environment Agency.

The evidence on infrastructure informs the content of the plan as a whole, most specifically policy 4 on strategic infrastructure, appendix 1 which provides additional detail to support policy 4, and site allocation policies which include any site-specific infrastructure requirements.

[The GNLP Infrastructure Needs Study \(2020\)](#)

This report is a review of the infrastructure requirements to provide an update for submission. Very limited amendments to appendix 1 resulted from the update of the study.

Since the partners, which include Norfolk County Council as highways authority, have worked closely in recent years with Highways England, Network Rail and other transport bodies, comments received on the Site Allocations have been considered and incorporated in the Site Policies where applicable as a result there are no strategic objections to the Greater Norwich Local Plan, therefore, it is assumed that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met.

Outcomes set out in the NSPF

Strategic infrastructure to support growth is primarily provided by partners working with the GNDP on the local plan. The following agreements in the NSPF (2021) cover the strategic infrastructure on which the LPAs can have the most influence on delivery:

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

In line with the agreements above and those agreements highlighted in the economy section of these tables:

Outcomes set out in the GNLP

[Policy 2 Sustainable Communities](#) encourages developers to work with service providers on the delivery of a broad range of existing, developing and future technologies, with broadband and mobile phone networks a current focus. Developers must therefore ensure broadband infrastructure is provided for new developments.

[Policy 4 – Strategic Infrastructure](#) supports the transport plans, projects and agreements produced by Highways England, NCC and Network Rail and the provision of other types of strategic infrastructure, including power and water.

Further to this, policy 4 of the GNLP includes support for:

- Transport improvements which embrace new technologies and develop the role of Norwich as the regional capital and support strategic growth in the Cambridge Norwich Tech Corridor (the road and rail corridor with the potential for economic growth linking the cities);
- A47 improvements (Highways England – shown on the GNLP [Key Diagram](#) as Road Improvement Schemes and junction improvements);
- An A140 Long Stratton bypass (NCC - shown on the GNLP [Key Diagram](#));
- Enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail link and innovative use of the local rail network (rail companies and Network Rail);
- Continued investigation of and support for rail freight opportunities;
- The growth and regional significance of Norwich Airport;
- Implementation of the Transport for Norwich Strategy including:
 - significant improvements to sustainable travel to promote modal shift;
 - developing the role of the park and ride system; and
 - delivery of the Norwich Western Link road by NCC - shown on the GNLP [Key Diagram](#)).

In developing the GNLP authorities have been working together to make best use of the current infrastructure and identify the new infrastructure we will need.

At the local level, in recent years, significant new infrastructure such as the Broadland Northway road and public transport and cycling improvements have been delivered. The Broadland Northway road has improved access to the north of Norwich, Norwich Airport and North Norfolk, and will assist in bringing forward significant growth to the North East of Norwich which forms part of overall growth in the GNLP. Further improvements to transport infrastructure will support further jobs growth the continuation of the recent major increase in housebuilding.

Outcomes from strategic working in the NSPF and the GNLP

Norfolk has benefitted from a number of significant improvements to transport infrastructure documented in the NSPF. Transport priorities which influence the GNLP are set out in several other strategies including: the Norfolk Local Transport Plan; the Norwich Area Transportation Strategy; the emerging Transport for Norwich strategy and Transforming Cities. These are in addition to national and regional rail and road investment strategies and programmes.

Norfolk Rail Prospectus: The Rail Prospectus sets out Norfolk County Council's requirements for rail. Norfolk County Council uses the prospectus in its dealings with government, train companies, Network Rail and other stakeholders to get the best for the people of Norfolk. The prospectus is being updated. The refreshed prospectus will be adopted in spring 2021 and will include longer term requirements to 2029 and beyond. This ongoing cooperation will continue with Norfolk County Council as a partner in the GNLP review.

Education

Norfolk County Council is responsible for planning for education infrastructure. Evidence in the GNLP IR shows that school capacity to serve growth will be met both by improvements to existing schools and through new schools being provided.

As a rule, if a new development is likely to generate enough children to fill a new school, Norfolk County Council asks developers for the full cost of building that school. A pro rata contribution of the full cost is requested if numbers of children are calculated to be less than 420, a two-form entry primary school. With the current CIL approach locally, only land can be secured through a S106 agreement and the build cost of the new school is claimed through CIL.

GNLP Appendix 1 provides details of new schools to serve growth. Sites in this plan and other local plan documents include locations for new schools. The requirement for a new high school in the North East growth area is specifically identified in policy 4 due to its strategic significance.

The policy provides flexibility for the provision of new schools to take account of changing circumstances and allow for the timely delivery of schools when and where they are required.

The information in appendix 1 will be updated annually through the Greater Norwich Infrastructure Plan (GNIP), or any successor, to ensure that it is up to date.

Outcomes set out in the NSPF and the GNLP

Norfolk County Council have six schools (three primary, one free school and two primary relocation and expansion) either in the process of being built or plans are in place for building over the next 2-3 years.

There will be additional new schools and school expansions to provide for the new allocations made through the GNLP. For larger sites, these have been considered as part of site allocations e.g. the site for 1,400 homes at Taverham includes a primary school site and Sprowston 1,200 includes a High School.

Ongoing cooperation -Ongoing cooperation on these matters will continue through the review of the NSPF, LTP, GNLP and other relevant plans and programmes.

In addition, see SCG with Breckland DC in Appendix 3

Ongoing Cooperation

Ongoing cooperation through the review of the NSFP and GNLP.

Greater Norwich Local Plan

Health

Strategic Planning Issue: Planning and Health: collaboration between local planning authorities, health service organisations and public health agencies to plan health care facilities to serve future growth and to ensure new development promotes healthy and active lifestyles.

Evidence Base

[Planning in Health Revised \(2019\)](#)

Strategic Partners (D to C)

Planning in Health: East Suffolk Council is responsible for Waveney part of the Great Yarmouth and Waveney CCG Norfolk and Waveney STP.

The partners in the Greater Norwich area which cooperate through the STP are:

- NHS Norfolk and Waveney Clinical Commissioning Group;
- Norfolk and Norwich University Hospital NHS Foundation Trust;
- Norfolk Community Health and Care NHS Trust;
- Norfolk and Suffolk NHS Foundation Trust;
- East of England Ambulance Service NHS Trust;
- East Coast Community Healthcare CIC
- Clinical Commissioning Groups
- Health Partners and Public Health Norfolk / Public Health Suffolk Norfolk County Council

Actions

[Planning in Health Revised \(2019\)](#)

This is an engagement protocol between local planning authorities, the Norfolk and Waveney Sustainability and Transformation Partnership (STP), Clinical Commissioning Groups, Health Partners and Public Health Norfolk and Public Health Suffolk. Its aim is to provide greater coordination between health care providers and planning, enabling long term strategic coordination of the health care facilities required to serve growth and to assist the development of new communities which promote healthy and active lifestyles (see further below).

In addition to the above, the evidence to determine the health care requirements set out in appendix 1 of the GNLP has been provided by the STP.

The engagement protocol for planning health in Norfolk has come about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view. The 2017 version of the protocol has been updated to take into account of the emergence of the NHS Sustainability and Transformation Partnership (STP). The revision also includes updates to include East Suffolk Council which is responsible for the Waveney part of the Great Yarmouth and Waveney CCG and the Norfolk and Waveney STP.

This protocol was first jointly prepared by Greater Norwich and Norfolk County Council staff working with health care professionals. Amendments in 2018 were made in collaboration with Public Health officers at Norfolk County Council, county and district planners and CCG and NHS partners. Amendments in 2019 were made in collaboration with East Suffolk Council and Suffolk County Council.

The protocol covers both plan making and significant planning applications and has assisted health care professionals to gain a greater understanding of, and input on, where additional facilities will be required to serve growth.

See also the Infrastructure Section and the Infrastructure Needs Study.

Outcomes set out in the NSPF

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Outcomes set out in the GNLP

Policy 2 – Sustainable Communities includes a requirement for Health Impact Assessments for allocated sites of 500 dwellings plus, for non-allocated housing sites of 100 dwellings plus and for any housing proposal with a significant amount of housing for the elderly to show how the health care infrastructure needs of the new development are provided for.

The policy also references use of the National Design Guide (and any subsequent related publications) to ensure good urban design and encourages, but does not require, the use of the Building for a Healthy Life design tool to encourage the delivery of development which promote healthy and active lifestyles, or any equivalents or future successors. The aim is to create “20 minutes neighbourhoods” in which most needs can be provided for using sustainable modes of travel.

Greater Norwich Local Plan

Policy 4 Strategic Infrastructure sets out that the GN authorities, working with the partners in the STP, will lobby for the timely delivery of the health care infrastructure required to serve growth, including that set out in Appendix 1 of the GNLP strategy. This includes the Norfolk and Norwich University Hospital, which provides strategic cross boundary health care services for many areas of Norfolk.

Ongoing cooperation

Cooperation will be ongoing through future reviews of the NSPF, the Planning in Health Protocol and the GNLP.

Climate Change: including Flood Risk / Water / Energy Efficiency

Strategic Planning Issues: **Tackling the challenges of Climate Change –** Addressing the challenge of flood risk, planning for water resources, wastewater management and energy efficiency.

Evidence Base

- [Greater Norwich - SFRA - Level 1](#)
- [Greater Norwich - SFRA - Level 2](#)
- [Water Cycle Study for GNLP \(WCS\)](#)
- [Greater Norwich Energy Infrastructure Study \(March 2019\)](#) (5.95 MB)

Strategic Partners

SFRA Level 1: Environment Agency, Norfolk County Council (the Lead Local Flood authority (LLFA)), The Broads Authority, Anglian Water, Internal Drainage Boards, Broadland District Council, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council, South Norfolk Council, All the commissioning authorities; The Lead Local Flood Authority (Norfolk County Council); Environment Agency; Internal Drainage Boards (Downham Market Group of IDBs, East Harling IDB, Middle Level Commissioners, Water Management Alliance, Waveney IDB); Anglian Water; Highways England; and, Planners at the neighbouring authorities and LLFAs.

SFRA Level 2: Environment Agency, Norfolk County Council (NCC: Lead Local Flood authority (LLFA)), The Broads Authority, Anglian Water, Internal Drainage Boards, Broadland District Council, Norwich City Council, South Norfolk District Council.

Water Cycle Study (WCS): Environment Agency, The Broads Authority, Anglian Water and Natural England.

Energy Study: Norfolk County Council, the Broads Authority.

Summary of Evidence Base

Greater Norwich Area Strategic Flood Risk Assessment (SFRA) Level 1 (2017)

A consortium of Norfolk LPAs commissioned a Level 1 SFRA to inform strategic planning decisions, the preparation of local plans and to inform development management decisions. Its main output is mapping identifying areas at risk of flood including an allowance for climate change. SFRA's form part of the evidence base of local plans and inform Sustainability Appraisal. The report was produced by JBA Consulting and contains the follow up Level 2 SFRA report noted below.

Greater Norwich Area Strategic Flood Risk Assessment (SFRA) Level 1 (2017)

The Greater Norwich authorities commissioned the Level 2 SFRA in collaboration with key bodies to further assist in the process of site selection and meet national planning requirements for allocating sites in areas with some flood risk. It covers a limited number of sites by the River Wensum in and near the city centre.

Water Cycle Study for the GNLP (2020)

As per NSPF: SCG the GNLP commissioned a Water Cycle Study for Greater Norwich to provide further evidence on the water environment. It was produced by AECOM Consultants. It has assessed proposed development throughout the study area with regard to water supply capacity, wastewater capacity and associated environmental capacity. Water quality issues, water infrastructure upgrades, and potential constraints have been identified and reported. This WCS also provides information to demonstrate that there are workable solutions to key constraints to deliver future development for the development sites presented, including recommendations on the policy required to deliver it. The WCS has been carried out with the guidance of the steering group comprising of the GNLP authorities, Anglian Water Services (AWS); the Environment Agency and Natural England. In addition, adjoining districts and counties were consulted in order to consider any potential cumulative impact arising from other plans in the wider area. Consultation was also undertaken with Landscape Partnership Consultants producing the HRA. This forms part of duty to cooperate by considering cumulative impacts from adjacent LPAs and cross boundary issues.

The Greater Norwich Energy Infrastructure Study (2019)

Egnida Consultants were commissioned to review current energy infrastructure and to identify areas where there may be constraints with energy supplies now and in the future. The study explored ways to work around these constraints and mitigate their impact, and whether alternative approaches to energy supplies or planning policy are required. This study provides evidence in order for the GN Local Plan to support energy policies for development and the spatial distribution of growth in the plan to prevent negative impacts on neighbouring authorities in the future.

Please note that green infrastructure is covered in the table below rather than in this section.

Outcome set out in the NSPF 2021

NSPF Agreement 3 (relevant section) - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

- To reduce Norfolk's **greenhouse gas emissions** and improving air quality as well as reducing the impact from, exposure to, and effects of climate change.

Agreement 19 - Local Planning Authorities in Norfolk agree that **climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans**. To do this, Local Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against Norfolk Strategic Planning Framework Page 4 local factors including viability of developments. Local Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Agreement 20 - Norfolk Local Planning Authorities agree to work together to investigate the production of a **county wide climate change best practice guide/design guide** and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.

Agreement 21 – Norfolk Authorities have agreed to become members of Water Resources East (WRE), and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious **water stress**; the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed **utility projects** to ensure that development is aligned with **water and wastewater infrastructure**.

Flood Risk – although there is not a specific flood risk agreement, section 9.9 of the NSPF covers the issue and states “To address these strategic issues it will be necessary to take a co-ordinated and proportionate approach to managing flood risk including the opportunities not only for mitigation but also adaptation”. It points to the importance of flood risk assessments being used to ensure development is located away from areas of flood risk wherever possible. It also identifies the importance of high-quality urban design, natural flood risk management including green infrastructure and Sustainable Drainage Systems (SUDs) as part of an integrated approach to water management with water re-use measures forming part of the overall design of developments.

Outcome set out in the GNLP

The GNLP contains policies which cover all relevant aspects of the NSPF agreements for how local plans in the county should address the strategic issue of climate change. This is set out in the Climate Change Statement in the GNLP strategy and mainly achieved through the design of development required by Sustainable Communities Policy 2. The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating, resource efficiency, the minimisation of pollution and green infrastructure.

More specifically –

Water:

Water efficiency and protection of water quality, in particular to protect designated habitats in the Broads, is promoted in policy 2. Greater efficiency in water usage will minimise the need for new infrastructure. Water efficient buildings will also contribute to the protection of our water resources and water quality, helping to ensure the protection of our rivers, the Broads and our other wetland habitats. Policy 2 also requires water quality to be protected. Policy 4 provides policy for infrastructure for water supplies and wastewater.

Anglian Water’s Water Resources Management Plan provides for water supplies to support growth, including water transfers to neighbouring Breckland and North Norfolk.

Infrastructure Requirements Anglian Water’s Water Recycling Long Term Plan plans for growth to 2045 are in appendix 1 of the strategy.

Flood Risk:

The GNLP locates the great majority of development away from areas at risk of flood and promotes development which supports more natural functioning of the water environment.

In accordance with policy 2 of the GNLP strategy, development must mitigate flood risk. This is particularly relevant to development on brownfield sites to provide urban regeneration adjacent to the River Wensum in Norwich, which will continue to be designed to withstand flood, taking account of the most up to date evidence which is currently supplied by the L2 SFRA.

Energy Efficiency:

Policies 2 and 4 promote improvements to the energy grid, the development of local, renewable and low carbon energy networks to serve major new developments and an increase in free standing renewable energy generation, such as solar farms. Energy efficiency is also promoted, though it seems likely that changes to national policy will supersede the policy requirement.

The strategic location of growth

The great majority of growth in the GNLP is located in and on the edge of the Norwich urban area and Greater Norwich's towns and larger villages. A limited amount of growth is located in the on the edge of other villages to help to retain their services, reducing the need for residents to travel to access those services.

Ongoing cooperation

Cooperation will be ongoing through the review of the NSPF, GNLP and planning application stages in the respective councils. In addition, please see the Breckland SCG in Appendix 3 and 6.

Natural Environment

Strategic Planning Issue: Conservation and enhancement of the natural environment including biodiversity.

Evidence Base

[Habitat Regulations Assessment \(HRA\)](#)

[GNLP GI Study Report - December 2020](#)

[Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy
GIRAMS](#)

Strategic Partners D to C

SA Report: Historic England, Natural England and the Environment Agency.

HRA/ GI Study/ GIRAMS: Natural England, Environment Agency, Norfolk County Council Environment Team

NSPF: the MMO has recently been a signatory body (2021)

Actions

The **Habitat Regulations Assessment (HRA)** of the GNLP was prepared by the Landscape Partnership. This has been an ongoing and iterative process which has consisted of:

- a. A screening report focussing on the assessment of twenty-two strategic growth locations for the emerging plan which was completed in July 2017;
- b. Subsequently an Interim HRA was completed which assessed the emerging policy alternatives within the GNLP Growth Options consultation document;
- c. The Habitat Regs accompanying the Reg. 18 from January to March 2020 identified European sites within and near the GNLP area along with their qualifying features to determine if these would be directly or indirectly affected by the emerging local plan;
- d. In addition to the issues above, other impacts were considered for the Regulation 19 stage including the water cycle (the use and disposal of water), air pollution (especially from new roads and an increase or change in the pattern of distribution of road users), water pollution/enrichment resulting from discharge to water, and the impacts of increased visitors to European sites.

Overall, the aim was to determine whether the plan would have a likely significant effect upon the integrity of any European site. In addition to considering the potential impacts of the growth proposed by the GNLP alone, a number of other plans or projects were identified that could have in-combination impacts.

The preparation of the HRA has involved ongoing work and cooperation with key partners including Natural England and the Environment Agency.

Green Infrastructure and Recreational Impact Avoidance and Mitigation

Strategy (GIRAMS) - A county wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) has been produced. The output includes:

- a review of strategically significant opportunities for the provision of new and enhanced Green Infrastructure;
- the current management measures for visitors to the European sites and evidence for recreational disturbance “hotspots” or particular concerns with locations proposed for housing growth;
- developing the mitigation necessary to avoid the significant adverse effects from “in-combination” impacts from residential development and identify a detailed programme of strategic mitigation measures which to be funded by developer contributions from residential development.

The study proposes a tariff-based payment that will be used to fund package of avoidance and mitigation measures to be delivered at Habitat Sites. This consists of a team of rangers to influence visitor behaviour, signage, monitoring, a dog project, providing strategic mitigation projects, and various other tasks.

It is considered that these GIRAMS measures are sufficient that the HRA assessment is able to ascertain no adverse effect upon the integrity of any European site from the in-combination effects of residential developments across the plan area and beyond.

As this has implications outside the GNLP boundary and in the wider area, this study has been part of the NSPF update (see agreement 28 below).

Policy 3 of the GNLP (see below) consequently includes policy requirements, including a tariff, to address these issues.

This project has involved other external partners including Natural England and the Environment Agency under the duty to cooperate. The GIRAMS is not currently adopted by the Local Planning Authorities across Norfolk but it is expected that it will be shortly. The matter has been addressed in the statement of common ground produced with Natural England on their representations to the GNLP policies.

Green Infrastructure Study

Long-term work is ongoing to improve and expand the green infrastructure network through the Greater Norwich and beyond. The study output includes advice on the green infrastructure opportunities associated with the development sites proposed through the GNLP which have been worked into policies.

NSPF 2021 coverage

NSPF Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

The MMO recently became a signatory in the NSPF: SCG see also SCG with GNLP and MMO see Appendix 3

Agreement 28: In recognition of:

- a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;
- b) the pressure that development in Norfolk could place on these assets; and
- c) the importance of ecological connections between habitats

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

GNLP coverage

Reflecting the agreements in the NSPF and the content of the NPPF and legislation, the GNLP seeks to protect and enhance the environment in a number of ways. This includes the vision which seeks “*significant further improvements to our extensive green infrastructure network*”, and policies 1, 2, 3, 4 and 7 of the GNLP which support further development of the green infrastructure network to provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats.

More specifically:

- [Policy 2- Sustainable Communities](#) requires
 - Water efficiency and protection of water quality to protect habitats, particularly in the Broads;
 - On-site green infrastructure (GI) provision to link and contribute to the further development of an area-wide GI network promoted through policies 3 and 4.

- [Policy 3- Environmental Protection and Enhancement](#)
 - Based on the NSPF work, supporting text and maps set out the GI network which is to be further developed and enhanced through the plan to 2038 (see maps [8A and 8B](#)). With significant involvement from Natural England, enhancement of the GI network has now been in development in Greater Norwich for over a decade in accordance with the Greater Norwich Green Infrastructure Strategy and delivery plans, and other documents such as the River Wensum Strategy;
 - Sets a tariff for housebuilders (GIRAMS) as part of the strategy to address issues related to visitor pressure on protected habitats;
 - Requires biodiversity net gain on all development.
- [Policy 4-Strategic Infrastructure](#) provides further support for enhancing the GI network, stating *“In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in maps 8A and B”*.

Ongoing cooperation

Cooperation will be ongoing through the review of the NSPF and GNLP. See SCG with MMO – Appendix 3
See response from Natural England - Appendix 3

Historic Environment

Strategic Planning Issue: Conservation and enhancement of the historic environment including mitigation and adaptation through policy development.

Evidence Base-

HIA - Heritage Impact Assessments for Site Policies – Key Sites

Strategic Partners D to C

[HIA](#) - Historic England

HELAA – Norfolk County Council (Historic Environment) was consulted on historic Environment along with conservation officers within the GNLP for Sites considered through the HELAA process.

Actions

The GNLP has collaborated with Historic England as a result their comments made to on the Site Allocations Policies and strategic policies were considered and subsequent changes to policies were made. Furthermore, a number of Heritage Impact Assessments for Sites policies have been prepared as part of the evidence base at the request of Historic England to ensure that the historic environment is conserved and enhanced.

GNLP Coverage

Reflecting the content of the NPPF and legislation, the GNLP seeks to protect and enhance the built and historic environment in a number of ways. This includes the vision which says the GNLP will “*protect and enhance the distinctive local characteristics of our city, towns and villages and their separate identities. This will be achieved by shaping high quality, well designed and beautiful new development*”.

More specifically, GNLP:

- [Policy 2- Sustainable Communities](#) - requires development to
 - Respect, protect and enhance local character and aesthetic quality (including landscape, townscape, and the historic environment), taking account of landscape or historic character assessments, design guides and codes, and maintain strategic gaps and landscape settings, including river valleys, undeveloped approaches and the character and setting of the Broads;
 - Provide a Sustainability Statement to show, among other things, how the above will be achieved.
- [Policy 3- Environmental Protection and Enhancement](#)
 - Sets out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats;

- Recognises that conserving and enhancing the area's numerous heritage assets will continue to reinforce what makes Greater Norwich an attractive place to live in, work and visit

To achieve this, the policy requires development to:

- Be designed to create a distinct sense of place and enhance local character taking account of local design and other guidance, undertaking a heritage impact assessment if significant impacts might arise, and providing measures such as heritage interpretation to further the understanding of local heritage issues;
- Avoid harm to designated and non-designated heritage assets and historic character, unless there are overriding benefits from the development that outweigh that harm or loss and the harm has been minimised;
- Provide a continued or new use for heritage assets whilst retaining their historic significance.

Furthermore, sites allocated in the plan are required to protect and enhance the local built and historic environment.

In addition, reference is made to the need for archaeological investigations for sites allocated which fall within an Area of Main Archaeological interest in Norwich City Centre defined in Norwich's Development Management policies plan.

Sustainability Appraisal

The SA of the plan has involved co-operation with key D to C prescribed bodies, Historic England, the Environment Agency and Natural England. at all stages of the development of the plan and its accompanying SA. This has involved:

- Firstly, to identify the scope and level of detail of the information to be included in the SA, a [Scoping SA Report](#) was produced in March 2017 following consultation with Historic England, Natural England and the Environment Agency.
- Subsequently, Interim SA Reports of the policy alternatives within the GNLP were produced and consulted on. A SA Report for Strategy Growth Options was published, and a further iteration supported the consultation on the Draft Strategy and Sites document Preferred Options and Reasonable alternatives from January to March 2020.
- Most recently, a SA Report for the GNLP Reg.19 was published between February and March 2021.

Ongoing cooperation

This engagement with the 3 key bodies through SA has assisted in addressing cross boundary strategic issues. Ongoing cooperation through the review of the GNLP and the planning application process. See SCG in Appendix 3

Cooperation with Norfolk County Council Minerals and Waste

4.3 Norfolk County Council is the Minerals and Waste local authority. A local plan review is being prepared to consolidate its three current adopted plans into one and to extend its plan period to 2036. The GNLP therefore does not cover minerals and waste issues. The GNLP has consulted the county minerals and waste officers and their comments have informed the Site Policies and where relevant Minerals and Waste local plan policies have been cross referenced. In addition, the NSPF Update (2021) – Agreement 29 addresses issues related to this plan in more detail which does not directly impact the GNLP. The duty to cooperate has been met through Norfolk County Council being a partner in the GNLP.

5.0 Conclusions

5.1 The preparation of the GNLP has involved numerous public consultations. During this process collaboration has taken place with key bodies in formulating and refining strategic and site-specific policies as per the NPPF definition of the strategic priorities which should be addressed in a local plan. Furthermore, the comments received have assisted in shaping the plan, including the sites selected where appropriate. The GNLP engagement with D to C partners is set out in the preceding sections and includes the formal consultation stages as follows:

- SA Scoping Report for the GNLP - Consultation with key stakeholders (Natural England, Historic England and the Environment Agency) (June 2016) and final amendments made to the Final SA Scoping Report (March 2017)
- GNLP Call for Sites (July 2016)
- GNLP Site Proposals and Growth Options Consultation – including the Interim SA Report for GNLP Reg 18 (A) (January to March 2018)
- GNLP New Revised and Small Sites Consultation- Reg. 18 (B) (October to December 2018).
- GNLP Strategy and Site Allocations Preferred Options and Reasonable Alternatives – including the Draft SA Report and other evidence - Reg. 18C Draft Plan Consultation (January to March 2020).
- GNLP Strategy and Site Allocations - Pre-submission Reg. 19, Draft SA Report for GNLP, and HRA Publication was held between February – March 2021

5.2 These processes have assisted policy development as well as addressing strategic matters as a result.

5.3 The emails in appendix 3 set out in some detail how the main issues of concern to the different prescribed bodies have been addressed through the NSPF and

Greater Norwich Local Plan

in turn through the policies in the GNLP, as well as providing further detail on how those bodies have been engaged in the GNLP plan-making process. In the great majority of cases, they also include clarification from those bodies that D to C requirements have been met.

- 5.4 Following the publication of Reg. 19, the GNLP team has worked with a number of bodies prescribed under D to C to reach agreements on comments received on plan policies (rather than D to C issues) through SCGs to be considered at the Examination. These SCGs are separate from this Statement that is specifically on Duty to Co-operate issues. Furthermore, information on comments received during previous consultations is contained in the [GNLP Statement of Consultation](#).
- 5.5 The results of the discussions etc on Duty to Co-operate issues is summarised in Table 1 below.

Table 1 GNLP – Prescribed Bodies under Duty to Cooperate

Organisation	Response - Status
Environment Agency	Confirmation received that D to C has been met and there are no strategic issues outstanding. (See Appendix 3)
Historic England	Confirmation received that D to C has been met and there are no strategic issues outstanding (See Appendix 3)
Natural England	Awaiting confirmation that D to C has been met and there are no strategic issues outstanding. See Appendix 3)
CCA – Civil Aviation Authority	Confirmation received that D to C has been met and there are no strategic issues outstanding. (see Appendix 3)
Homes England	Confirmation received that D to C has been met through ongoing collaboration on East Norwich, Anglia Square and other opportunities. (see Appendix 3)
NHS/ Norfolk and Waveney STP - Sustainable Transformation Panel (health)	Confirmation received that the D to C has been met through the NSPF and GNLP. (See Appendix 3)

Greater Norwich Local Plan

The Office of Road and Rail	No response received therefore it is assumed that there are no objections in this regard. (See Appendix 3).
Great Yarmouth Borough Council	Support that D to C has been met through the NSPF and GNLP consultations – no outstanding strategic issues. (See Appendix 3).
Kings Lynn and West Norfolk BC	No response received therefore it is assumed that there are no objections in this regard. (See Appendix 3).
Babergh District Council and Mid Suffolk District Council (BMSDC)	Support that D to C has been met through the NSPF and GNLP consultations – no outstanding strategic issues. (See Appendix 3).
East Suffolk DC	No response received therefore it is assumed that there are no objections in this regard. (See Appendix 3).
Suffolk County Council	No response received therefore it is assumed that there are no objections in this regard. (See Appendix 3).
North Norfolk DC	No response received therefore it is assumed that there are no objections in this regard. (See Appendix 3).
Broads Authority National Park	Support that D to C has been met through the NSPF and GNLP consultations – no outstanding strategic issues. (See Appendix 3).
Norfolk County Council	Awaiting confirmation. The D to C has been addressed through the NSPF and the role of Norfolk County Council in producing the GNLP. (See Appendix 3)
Highways England	Awaiting confirmation. (See Appendix 3)
Wild Anglia	Comments received under DtC post Reg. 19. SCG being produced. (See Appendix 3 and Appendix 4).
MMO – Marine Management Organisation	Confirmation that MMO recently became a signatory in the NSPF (2021). The possibility of some strategic cross border issues raised (relating to regard to be had

Greater Norwich Local Plan

to the East Marine Plans). SCG being produced. (See Appendix 3 and Appendix 5).

Breckland DC

Awaiting confirmation. SCG being produced. (See Appendix 3 and Appendix 6)

- 5.6 The GNLP team and GNDP members have worked with a wide range partners in the production of the local plan and joint evidence base to address the strategic cross boundary matters and formulate strategic and site policies. The NSPF: Shared Spatial Objectives for a Growing County and Statement of Common Ground (2021) and (2019) documents show how the Norfolk planning authorities maintain effective cooperation between themselves, with the neighbouring district and county planning authorities, and with other key relevant agencies and utilities. In doing so it meets the relevant requirements of Section 3 of the 2019 National Planning Policy Framework (NPPF). See Appendix 1 NSPF: SCG (2021) and Appendix 2 NSPF: SCG (2019) Agreements.
- 5.7 As an agreement between the planning authorities on approaches to strategic infrastructure, housing and jobs numbers and common policy approaches, the NSPF: SCG fulfils the requirement for Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and on-going joint working across the county on strategic planning matters. It addresses key cross-boundary issues and progress in cooperating to address these. **Agreement 30** states that *'In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk planning authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity'*. Further to this, **Agreement 31** states: *Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.*
- 5.8 This content of this statement is intended to assist the Inspector in considering the Duty to Co-operate requirements for the Greater Norwich Local Plan and demonstrating that they have been met.

Greater Norwich Local Plan

Appendix 1 Norfolk Strategic Planning Framework (NSPF): Shared Spatial Objectives for Growing County and Statement of Common Ground (SCG) (2021) Agreements

Summary of Formal Agreements within the Statement of Common Ground Please Note: 'Norfolk Planning authorities' and 'Norfolk Authorities' refers to the 7 district authorities that make up Norfolk (see section 1.4), the Broads Authority and Norfolk County Council.

Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

Agreement 3 - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

- To realise the economic potential of Norfolk and its people*
- To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change*
- To address housing needs in Norfolk*
- To improve the quality of life and health for all the population of Norfolk*
- To improve and conserve Norfolk's rich and biodiverse environment*

*Full details of each objective are in section 2 of the NSPF (2021)

Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

Greater Norwich Local Plan

Agreement 8 – Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

Agreement 9 - The list of locations in section 5 are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.

Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Agreement 17 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done: • Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development. • Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.

Greater Norwich Local Plan

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Agreement 20 - Norfolk Planning Authorities agree to work together to investigate the production of a county wide climate change best practice guide/design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.

Agreement 21 – Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over

Greater Norwich Local Plan

10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues: • Infrastructure • Governance • Heritage • Marine Protected areas • Marine and coastal employment • Sustainable port development • Energy – offshore wind and oil and gas • Access for tourism and recreation • Sustainable and aquaculture fisheries in small harbour towns • AONB and Seascape and landscape (character and natural beauty) • Biodiversity • Marine aggregates • Cabling • Water quality/water supply and sewerage • Climate change/ Coastal erosion and coastal change management

Agreement 28: In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; b) the pressure that development in Norfolk could place on these assets; and c) the importance of ecological connections between habitats Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

Agreement 29: It is agreed that: 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an

Greater Norwich Local Plan

important contribution to the national production of silica sand. 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand. 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development. 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy. 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period. 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages. 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.

Agreement 30: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

Signatories (2021)

The Signatories for the NSPF are:

• Breckland District Council • Broadland District Council • Broads Authority • Great Yarmouth Borough Council • Borough Council of King's Lynn and West Norfolk • North Norfolk District Council • Norwich City Council • South Norfolk Council • Norfolk County Council • Natural England • Environment Agency • Anglian Water • Marine Management Organisation • New Anglia Local Enterprise Partnership • Active Norfolk • Water Resources East

Greater Norwich Local Plan

Acknowledgements The following organisations supported in the production of the NSPF:SCG : • Breckland District Council • Broadland District Council • Broads Authority • Great Yarmouth Borough Council • Borough Council of King’s Lynn and West Norfolk • North Norfolk District Council • Norwich City Council • South Norfolk Council • Norfolk County Council • Suffolk County Council • Babergh & Mid Suffolk District Councils • East Suffolk Council • West Suffolk Council • Fenland District Council • East Cambridgeshire District Council • South Holland District Council • Natural England • Environment Agency • Wild Anglia • Anglian Water • New Anglia Local Enterprise Partnership • UK Power Networks • Cambridgeshire and Peterborough Combined Authority • Norfolk and Waveney CCG • NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney • Mobile UK

Appendix 2 - Norfolk Strategic Planning Framework (NSPF): Shared Spatial Objectives for a Growing County and Statement of Common Ground (SCG) (2019) - Agreements

The NSPF (2019) endorsed 25 agreements as follows:

Agreement 1 – Norfolk Planning Authorities will plan to meet their objectively assessed housing needs until at least 2036

Agreement 2 – Norfolk Planning Authorities will contribute to delivering the joint vision

“By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

Agreement 3 – Norfolk Planning Authorities will maximise the delivery of the joint objectives (in no particular order):

- To realise the economic potential of Norfolk and its people *
- To reduce Norfolk’s greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change *
- To address housing needs in Norfolk *
- To improve the quality of life for all the population of Norfolk *
- To improve and conserve Norfolk’s rich and biodiverse environment *

[* full details of each objective are in section 2 of the NSPF]

Agreement 4 – To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk.

Agreement 5 – That Great Yarmouth and King’s Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

Agreement 6 – That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan

Agreement 7 – That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

Greater Norwich Local Plan

Agreement 8 – The listed ‘Tier One’ employment sites and should be the focus of investment to drive increasing economic development in key sectors and protected from loss to other uses.

Agreement 9 – The emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Agreement 10 – When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence. Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Agreement 11 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broads landscape and special qualities.

Agreement 12 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Agreement 13 – the Greater Norwich Local Plan will seek to deliver in full the additional supply of homes arising from the City Deal

Agreement 14 – The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Agreement 15 – All Local Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Agreement 16 – To minimise the risk of slow delivery over the next plan period by allocating a range of site sizes and providing clear evidence of the ability to deliver larger sites for development.

Agreement 17 – The Norfolk Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 18 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

Greater Norwich Local Plan

Agreement 19 - To engage with the telecommunications industry including Mobile UK to produce shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk

Agreement 20 – The authorities agree to endorse the updated Planning in Health: An Engagement Protocol Between Local Planning Authorities¹, Public Health and Health Sector Organisations in Norfolk and undertake its commitments.

Agreement 21 – The Local Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver

Agreement 22 – The Local Planning Authorities will work together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

Agreement 23 – The Local Planning Authorities will work with the Minerals and Waste Authority to meet the minerals and waste needs as efficiently and effectively as possible

Agreement 24 – To support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Agreement 25 – Norfolk Planning Authorities agree to maintain this statement of common ground on a regular basis reviewing it at least every two years to support the maintenance of up to date local plans across the county and ensure that the NSPF remains the most appropriate vehicle to address strategic planning matters for the county.

Signatories (2019)

1. The NSPF shared Spatial Objectives for a Growing County and Statement of Common Ground are:

Signatories

- Breckland District Council,
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Natural England
- Environment Agency

Greater Norwich Local Plan

- Anglian Water
- New Anglia Local Enterprise Partnership

Acknowledgements

The authors would like to thank the following organisations for their support in the production of this document:

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Suffolk County Council
- Babergh & Mid Suffolk District Councils
- Waveney District Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Wild Anglia
- Anglian Water
- New Anglia Local Enterprise Partnership
- UK Power Networks
- Cambridgeshire and Peterborough Combined Authority
- Great Yarmouth & Waveney CCG
- North Norfolk CCG
- Norwich CCG
- South Norfolk CCG
- West Norfolk CCG
- NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney
- Mobile UK

Greater Norwich Local Plan

Appendix 3 – Emails Confirmations (extracts) - D to C – Prescribed bodies

In addition to other forms of engagement including the NSPF set out in the main text of this statement, the following emails and responses relate to the D to C with the bodies prescribed under the Duty to Cooperate. While the emails confirm that effective engagement has taken place, specific policy concerns from Natural England, Historic England and the Environment Agency remain and are covered in Statements of Common Ground to be considered at the examination.

The emails are presented in reverse order chronologically showing the positive response on D to C from the officer from each prescribed first. Each initial email from the GNLP officer provides specific detail on how the main strategic issues of concern to each prescribed body have been addressed through both the NSPF and the GNLP. Please note that there are exceptions in which some of the bodies have not responded to any correspondence despite reminders.

Babergh District Council & Mid Suffolk District Council

Dear Isabel

Thank you for your e-mail dated 8th January 2021.

We can confirm that there are no outstanding strategic planning issues to be addressed and the overall plan-making process for the GNLP has enabled effective engagement for Mid Suffolk District Council.

Apologies for the delay in replying to your e-mail and this position has Cabinet Member for Planning support.

Kind regards

Rob

Robert Hobbs

Corporate Manager – Strategic Planning

Babergh District Council & Mid Suffolk District Council – Working Together

www.babergh.gov.uk & www.midsuffolk.gov.uk

Greater Norwich Local Plan

Dear Rob,

**Re: Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage
Duty to Cooperate – Statement of Common Ground (SCG)**

This email is intended firstly to notify you that the Greater Norwich Local Plan (GNLP) Regulation 19 Publication Stage pre-submission draft plan is scheduled to be published on the Greater Norwich website at www.gnlp.org.uk between 1st February 2021 and 15th March 2021. Greater Norwich consists of Broadland, Norwich and South Norfolk, working with Norfolk County Council and the Broads Authority. When adopted, the GNLP will provide the planning strategy for the three districts from 2018 to 2038 and allocate many of the sites to assist in implementing that strategy.

Secondly, in relation to Duty to Cooperate requirements as we move towards examination on the plan, the GNLP team seeks to confirm the following:

1. Your authority is satisfied that the Norfolk Strategic Planning Framework (NSPF), including the Norfolk -Suffolk authorities' member and officer meetings organised through the NSPF, have covered strategic cross boundary planning issues as far as they relate to Greater Norwich and *Mid Suffolk*. If you agree with this, please could you confirm that there are no outstanding strategic planning issues to be addressed.
2. The overall plan-making process for the GNLP has enabled effective engagement for your local authority with Greater Norwich.

Thank you in advance for your response on this matter.
I would be grateful if you could please reply by **15 March 2021**.
Regards,

Isabel Appleyard on behalf of Mike Burrell, Greater Norwich Planning Policy Team Manager

Isabel Appleyard, MRTPI
Senior Planning Officer (Policy)
Greater Norwich Local Plan Team (GNLP)



General Enquiries Tel: (01603) 306603
GNLP@norfolk.gov.uk www.greaternorwichlocalplan.org.uk/

The Greater Norwich Local Plan
Growing Stronger Communities Together
gnlp@norfolk.gov.uk

Greater Norwich Local Plan

Broads Authority

Dear Adam

Thanks for the email.

What you have set out is a fair reflection of the ways that GNLP and the Broads Authority cooperate.

Thank you

Natalie Beal
Planning Policy Officer
Broads Authority

Dear Natalie,

As we discussed last week, I am emailing in relation to the Duty to Cooperate for the Greater Norwich Local Plan (GNLP). It being an ideal time to confirm the extensive cooperation that has taken place in recent years between the Broads Authority and the other Greater Norwich Authorities.

Links between the organisations are strong. For example, of the 21 Members governing the Broads Authority, two elected councillors are drawn from Norfolk County Council, and one each from Broadland, Norwich, and South Norfolk. Also, as a member of the Greater Norwich Development Partnership (GNDP), the Broads Authority has direct management of the GNLP, along with the councils of Broadland, Norwich, and South Norfolk, as well as Norfolk County Council.

In addition to direct involvement in writing the GNLP, the context for cooperation between the Broads Authority and other Greater Norwich authorities is found in the Norfolk Strategic Planning Framework (NSPF). For which key points of the NSPF are:

- Agreement on the importance the Broads (amongst other habitats) in adding to the quality of life, health and wellbeing, economy, tourism and benefits to biodiversity.
- Agreement on key cross-boundary economic issues and Interventions, of which examples are the rural economy (including agriculture), tourism and recreation, and development of market towns.

Greater Norwich Local Plan

- Agreement on the Greater Norwich councils including appropriate provision to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan. (Although currently the Local Plan for the Broads adopted 2019 meets its own objectively assessed need for 286 homes over for the period 2015 to 2036.)

The Regulation 19 GNLP, published in 2021, takes account of the key overlapping issues common to Greater Norwich and the Broads Authority. These areas of cooperation are:

- Recognition of the Greater Norwich Area Strategic Flood Risk Assessment, and the importance of flood defences within the Broads Authority planning area.
- How growth in Greater Norwich could affect the Broads and its many habitats of international and national status, which can be addressed by providing alternative green spaces and buffer zones that help manage visitor pressure on biodiversity.
- That landscape character studies and strategic landscape gaps protect the setting of the Broads (such as those found along the rivers Bure, Chet, Tas, Tiffey, Waveney and Wensum).
- The importance of water efficiency and protection of water resources to protect the wetland habitats of the Broads.
- The unique opportunity presented by the East Norwich Strategic Regeneration Area, but how this development must be well-designed to account for its sensitive location in and adjacent to the Broads Authority area.
- How part of the East Norwich Strategic Regeneration Area corresponds with Policy NOR1 of the adopted Broads Local Plan 2019, which seeks to provide mixed use development of up to 120 homes.
- While not required to do so because the Local Plan for the Broads meets its own objectively assessed need for 286 homes, the GNLP could fulfil the need arising within the Broads Authority administrative boundary which overlaps with the Broadland, Norwich, and South Norfolk areas. As the GNLP contains an overall housing potential of 49,492 homes, against a local housing need of 40,541.
- The need for 63 additional permanent residential moorings during the period 2017-2036, as identified by a Caravans and Houseboats Accommodation Needs Assessment in 2017, is being met by policies and permissions in the Broads Authority area.

Greater Norwich Local Plan

In the light of the above information, and from our previous conversation, I am not aware of any outstanding Duty to Cooperate issues to be addressed, but I would appreciate your confirmation of this, ideally by 6th May. So that officers and elected councillors can be assured that no outstanding Duty to Cooperate matters remain prior to the GNLP being submitted to the Planning Inspectorate later this year.

Thank you in advance for your help.

Kind regards,

Adam Banham CIHM MRTPI
Greater Norwich Local Plan Team

The Greater Norwich Local Plan
Growing Stronger Communities Together
gntp@norfolk.gov.uk



Greater Norwich Local Plan

Civil Aviation Authority (CAA)

Dear Mike

Thank you for your email dated 22 March regarding the above Local Plan. Please be advised that the CAA have no comments on the above Local Plan.

Kind Regards

Emma Forrest

Shared Services Officer
Organisation Approvals
Technical Governance and Support Services
UK Civil Aviation Authority



Dear Sir or Madam,

I am emailing the Civil Aviation Authority in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**. The GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038.

Norfolk County Council (NCC) are the local highways authority which produce transport plans for the area and are part of the Greater Norwich partnership producing the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk.

We note that your Planning Consultation Requirements [advice note](#) (page 5) states that “*The CAA does not normally comment on development plans preferring aeronautical interests to represent themselves. It is therefore recommended that you direct your communication to any aeronautical site that may be affected by the development plan*”. Your note also states “*Where consultation is required under Section 110 of the Localism Act 2011, the CAA will only respond to specific questions (but will nevertheless record the receipt of all consultations)*”.

As per your advice note, Norwich Airport has been consulted on the GNLP and has not stated that there are any strategic cross boundary issues excluded from the plan.

NCC and the Greater Norwich districts of Broadland, Norwich and South Norfolk, along with other partners, have produced the [Norfolk Strategic Planning Framework \(NSPF\)](#), a strategic document which provides a Statement of Consultation which meets the requirements of the Duty to Cooperate. The NSPF supports the economic role and growth of the airport.

Greater Norwich Local Plan

Reflecting the content of NCC transport plans, including the recent completion of the A1270 Broadland Northway road improving access to Norwich Airport, of the [publication version](#) of the GNLP, in particular [Policy 4](#):

- Recognises Norwich Airport is a catalyst for economic growth, has seen an increase in passenger numbers in recent years, and supports the offshore energy industry;
- Supports the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond. This is supported by the recent endorsement of a [masterplan](#) for growth at the airport by both Norwich and Broadland districts;
- Supports implementation of the Transport for Norwich Strategy with measures to further improve access to Norwich Airport including:
 - significant improvements to sustainable travel to promote modal shift;
 - developing the role of the park and ride system;
 - and delivery of the Norwich Western Link road.
- Provides for employment growth in the Norwich Airport area.

The GNLP team therefore requests a response to the following specific question:

The partners have worked closely in recent years with Norwich Airport which has raised no strategic objections to the Greater Norwich Local Plan (GNLP). Please could the Civil Aviation Authority, which has previously been consulted on the plan, confirm that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met?

Please could you respond to this email within 6 weeks i.e. by 5th May 2021.

Thank you in advance for your help on this matter.

Regards,

Mike Burrell,
Greater Norwich Planning Policy Team Manager.

The Greater Norwich Local Plan
Growing Stronger Communities Together
gntp@norfolk.gov.uk

Greater Norwich Local Plan

Environment Agency

Good Morning Mike

Thank you for your email in regard to the duty to co-operate for the Greater Norwich local plan.

We are in broad agreement that this has been met and your email below provides really useful information, specifically in regard to Green Infrastructure. We are pleased with your excellent engagement with us on flood risk and the water cycle study and am pleased with how productively we have been able to work together on these matters.

As you should be aware, we did raise some comments to the Local Plan in relation to foul water infrastructure and WFD. I don't think it would take much at all for us to be able to come to a final agreement on these. The main points that need addressing are:

- Including our suggested wording (or something similar) as outlined in our response to policy 4 which ties the policy down to specifics relating to foul water infrastructure.
- It is important for the plan to refer to WFD as this is a key piece of legislation. This should be linked to water quality.
- It would be beneficial to refer to the water cycle study in the plan itself to ensure the reader is directed to this.

These points were raised in our previous response but were not actioned as part of the most recent consultation.

These points could be dealt with via SCG or a main modifications document. Like I say, just some minor tweaks are required and shouldn't be too onerous. We will assist in any way possible.

Would it be useful to get a MS teams meeting scheduled? I would be more than happy to discuss further with you. Alternatively, if I can be of any further assistance, please do get in touch and I will be more than happy to help as much as I can.

Kind Regards

Liam

Liam Robson

Sustainable Places Planning Advisor – East Anglia Area (East)



Greater Norwich Local Plan

Dear Liam,

I am emailing you as our main contact at the Environment Agency (EA) in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**.

As you are aware, the GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038, including the strategy for environmental protection and enhancement and addressing climate change. The Greater Norwich Development Partnership, which includes the Broads Authority and Norfolk County Council (NCC), oversees production of the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk.

The Greater Norwich districts, NCC and the Broads Authority have also worked with other partners including the EA (who are signatories to the document) to produce the [Norfolk Strategic Planning Framework](#) (NSPF). The NSPF is a strategic document which provides a Statement of Common Ground for Norfolk district planning authorities which meets the requirements of the Duty to Cooperate.

The EA is acknowledged within the document as having played a key role in the production of the framework, including making significant contributions to working groups.

The main issues the EA has assisted in developing strategic cross boundary policy approaches for through the NSPF which are directly relevant to Greater Norwich are:

1. Flood risk;
2. Water efficiency;
3. Water quality mainly focussing on protecting and enhancing designated natural habitats, especially in relation to water quality;
4. Minimising pollution and improving air quality;
5. Green Infrastructure Page 73 of the NSPF states "*As part of producing this Framework the authorities have commenced work on producing a GI strategy for Norfolk working with the Environment Agency, Natural England and Wild Anglia. This has produced:*
 - *Accessible public open space and Countryside Access maps;*
 - *Ecological Network Maps;*
 - *Identified potential Green Infrastructure Corridors throughout the county (the 'GI network')*
6. Mitigating and adapting to climate change.

Further to the work on the NSPF, the EA has contributed to the production of the GNLP throughout the plan making process through:

- responses to the Regulation 18 consultations;

Greater Norwich Local Plan

- assisting in developing the evidence base (especially in relation to the Habitats Regulation Assessment, the Water Cycle Study and Strategic Flood Risk Assessments),
- input on the sustainability appraisal.

Reflecting the agreements in the NSPF and the content of the National Planning Policy Framework and legislation, the publication version of the GNLP seeks to protect and enhance the environment and address climate change in a number of ways. This includes:

- [Policy 2 – Sustainable Communities](#) provides policy for
 - Water efficiency and protection of water quality, in particular to protect designated habitats in the Broads;
 - Minimising Flood risk, including the location of development and the inclusion of sustainable drainage;
 - Resource efficiency and the minimisation of pollution;
 - On-site GI provision to link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4.
- [Policy 3 - Environmental Protecting and Enhancement](#)
 - Based on the NSPF work, supporting text and maps set out the GI network which is to be further developed and enhanced through the plan to 2038 (see maps [8A and 8B](#)). With involvement from the EA, enhancement of the GI network has now been in development in Greater Norwich for over a decade in accordance with the Greater Norwich Green Infrastructure Strategy and delivery plans, and other documents such as the River Wensum Strategy;
 - Requires biodiversity net gain on all development.
- [Policy 4 Strategic Infrastructure](#) provides further support for enhancing the GI network, stating *“In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in maps 8A and B”*.

In the light of the above information, please could the Environment Agency confirm that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met.

Please could you respond to this email within 6 weeks i.e. by 4th May 2021.

Thank you in advance for your help with this matter.

Regards,

Mike Burrell,

Greater Norwich Planning Policy Team Manager.

Greater Norwich Local Plan

The Greater Norwich Local Plan

Growing Stronger Communities Together

gnlp@norfolk.gov.uk

Greater Norwich Local Plan

Health (STP)

From: Page Mark
Sent: 07 July 2021 11:27
To: Burrell, Mike
Cc:
Subject: RE: GNLP Duty to Cooperate

Dear Mike,

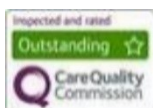
Your email sets out well the collaborative work done, and from the perspective of the Health partnership the Duty to Cooperate is met. You will be well aware that over the past few years we have worked hard with Planning authorities to re-position Health on the map and ensure it has profile alongside other public sectors in planning considerations – I am confident from experiences to date that policy frameworks continue to support health infrastructure development, recognising the impacts of growth in population over time. I do feel we must address one of the last few areas of concern to ensure that health gains full consideration across planning authorities for the use of CIL /S106 contributions when developing infrastructure. As such, the current permitted list of parties who maybe on the infrastructure lists annually for Broadland, South Norfolk and Norwich City Councils, needs to be addressed to enable investment in health. I would be grateful for your guidance on how that process maybe started formally and taken forwards with Councillors? I also look forward to our future work in making sure the GNLP is implemented.

My apologies in not replying sooner. I have been in regular contact with other members of your Team, and had assumed that was sufficient. If more information for the plan's examination is required please get in contact. My team and I will endeavour to help.

Kind Regards,

Mark Page MSc MIWFM

Assistant Director – Estates & Facilities
Norfolk Community Health and Care NHS Trust
Lead – for Estates - Norfolk & Waveney STP



Greater Norwich Local Plan

Dear Mark,

I am emailing you as our main contact at the NHS Sustainability and Transformation Partnership (STP) in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**.

As the STP includes both the Clinical Commissioning Groups covering the Greater Norwich area and NHS Commissioning, which are Duty to Cooperate bodies, as well as other health care professionals including Norfolk County Council public health, your response will confirm both the extensive and positive cooperation that has taken place in recent years between health care providers and planners in Greater Norwich and the high level commitment from the relevant bodies to this cooperation.

As you are aware, the GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038, including the strategy for infrastructure provision (including health care facilities) to meet growth needs and supports healthy and active lifestyles and well-being.

The Greater Norwich Development Partnership, which includes the Broads Authority and Norfolk County Council (NCC), oversees production of the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk.

The Greater Norwich districts, NCC and the Broads Authority have also worked with other partners including the STP to produce the [Norfolk Strategic Planning Framework](#) (NSPF). The NSPF is a strategic document which provides a Statement of Common Ground for Norfolk district planning authorities which meets the requirements of the Duty to Cooperate. Following its formation, the STP has contributed to working groups to produce recent updates to the NSPF.

The main strategic cross boundary policy approaches for health care provision and health and well-being are set out in "[Planning in Health](#)", a protocol for joint work between health care providers and local planning authorities in Norfolk which has been in use since it was agreed in 2017. Agreement 20 of the NSPF commits Norfolk planning authorities to undertaking the protocol's commitments.

The protocol aims to ensure that developments are carefully planned and managed to contribute positively to the health and well-being of a community. The Protocol seeks for health professionals and town planners to work together to secure new healthcare facilities required as a result of development. To provide the evidence for this, modelling data indicates future healthcare requirements for Norfolk. Based on each CCG area, projections are given on future demand for acute hospital beds, intermediate care beds, and the numbers of General Practitioners required. The protocol also encourages local plans to require Health Impact Assessments for larger developments.

Greater Norwich Local Plan

In addition, a Healthy Planning Checklist is part of “Planning in Health”. It provides a practical tool to assist developers and their agents when preparing development proposals and local planning authorities in policy making and in the application process. It also provides a framework for Norfolk County Council Public Health when considering health and wellbeing impacts of development plans and planning applications.

Further to the above, the STP has contributed to the production of the GNLP throughout the plan making process through:

- responses to the Regulation 18 consultations,
- evidence production on the health care infrastructure required to support growth in Greater Norwich to inform both the GNLP strategy and site allocations;
- ongoing engagement between officers on policy development, including quarterly meetings.

Reflecting the agreements in the NSPF and the content of the National Planning Policy Framework and legislation, the publication version of the GNLP seeks to support provision of the health care infrastructure required to support growth and to support health and well-being. This includes:

- [Policy 2](#) provides policy to support healthy and active lifestyles and health care provision by promoting/requiring:
 - Good access to services and facilities through active travel (walking and cycling), including health care facilities;
 - On-site GI provision to link and contribute to the area-wide green infrastructure network promoted through policies 3 and 4.
 - Inclusive and safe communities;
 - New technologies which can assist health care provision;
 - Health Impact Assessments for allocated sites of 500 dwellings plus, for non-allocated housing sites of 100 dwellings plus and for any housing proposal with a significant amount of housing for the elderly to show how the health care infrastructure needs of the new development are provided for.
- [Policy 3](#)
 - Based on the NSPF work, supporting text and maps set out the GI network which is to be further developed and enhanced through the plan to 2038 (see maps [8A and 8B](#)).
- [Policy 4](#) on strategic infrastructure commits the Greater Norwich local authorities to lobbying for the timely delivery of health care infrastructure. This is supported by appendix 1 of the plan which sets out the strategic health care requirements to support growth based on evidence produced by the STP, which will be updated over time.

Greater Norwich Local Plan

In the light of the above information, please could the STP confirm that there are no outstanding cross boundary strategic issues in relation to health to be addressed by the GNL P and that the requirements of the Duty to Cooperate have been met.

Please could you respond to this email within 6 weeks i.e. by 6th May 2021.

Thank you in advance for your help with this matter.

Regards,

Mike Burrell,
Greater Norwich Planning Policy Team Manager.

The Greater Norwich Local Plan
Growing Stronger Communities Together
gntp@norfolk.gov.uk

Please email gntp@norfolk.gov.uk for all general enquiries.

--

Greater Norwich Local Plan

Historic England

Please note that the response from Historic England confirms that the D to C has been met but that soundness concerns remain over specific policy issues in the plan. These soundness concerns have been/are being covered by a Statement of Common Ground produced for consideration by the Inspector.

Dear Mr Burrell

Duty to Cooperate for the Greater Norwich Local Plan

Thank you for your e-mail dated 26/03/2021 regarding the Duty to co-operate. As you are aware, Historic England is listed as one of the “prescribed” bodies relating to the Duty to Co-operate on the planning of sustainable development. Prescribed bodies are required to co-operate with local planning authorities constructively, actively, and on an ongoing basis in the preparation of development plans in relation to strategic matters.

In reaching our decision on the Plan in question, we have taken account of the extent to which your authority and Historic England have engaged in the preparation of the document and your response to any strategic matters which we may have raised.

As a statutory consultee, we consider that the Council has consulted fully with and, where appropriate, provided sufficient opportunities to engage with Historic England at all stages in the preparation of both the local plan and its accompanying Sustainability Appraisal. We are also satisfied that the Authority has taken proper account of our comments in formulating the document now under consideration and that it has provided sufficient reasons why, in some areas, the Authority has decided not to follow our advice, in particular in relation to Heritage Impact Assessments for a number of sites, taller buildings and the skyline as well as several other policy areas. As a result, although we consider that the authority has complied with the requirements of the Duty insofar as Historic England is concerned, nonetheless, for the reasons that we have set out in our response to the Regulation 19 Plan, we consider that, in some areas, the document is unsound.

We would hope that in light of the ongoing Duty that we will be able to continue to work closely with the Councils in the implementation of these policies. We are grateful for the recent meeting on 14th April at which we were able to discuss some of these outstanding concerns and look forward to continuing to work with your authority as we seek to resolve these issues and prepare a Statement of Common Ground in advance of the EiP.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Debbie Mack

Historic Environment Planning Adviser, Planning Group

Greater Norwich Local Plan

Dear Debbie,

I am emailing you as our main contact at Historic England (HE) in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**.

As you are aware, the GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038, including the strategy for the protection and enhancement of the built and historic environment. Detailed policies on these issues are in adopted development management policies.

The Greater Norwich Development Partnership, which includes the Broads Authority and Norfolk County Council (NCC), oversees production of the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk. The Greater Norwich districts, NCC and the Broads Authority have also worked with other partners to produce the [Norfolk Strategic Planning Framework](#) (NSPF). The NSPF is a county wide document which provides a Statement of Common Ground for Norfolk district planning authorities covering strategic cross boundary issues. It meets many of the requirements of the Duty to Cooperate, most specifically in relation to the provision of homes and cross boundary issues related to the protection and enhancement of the natural environment.

There has been ongoing work between HE and the GNLP team to discuss policy approaches in the emerging plan for protecting and enhancing the built and historic environment through both consultations on the GNLP and follow up meetings. In addition, HE has contributed to the development of the sustainability appraisal for the plan.

Reflecting the content of the National Planning Policy Framework and legislation, the publication version of the GNLP seeks to protect and enhance the built and historic environment in a number of ways. This includes the vision which says the GNLP will *“protect and enhance the distinctive local characteristics of our city, towns and villages and their separate identities. This will be achieved by shaping high quality, well designed and beautiful new development”*.

More specifically, GNLP

- [Policy 2](#) requires development to
 - Respect, protect and enhance local character and aesthetic quality (including landscape, townscape, and the historic environment), taking account of landscape or historic character assessments, design guides and codes, and maintain strategic gaps and landscape settings, including river valleys, undeveloped approaches and the character and setting of the Broads;
 - Provide a Sustainability Statement to show, among other things, how the above will be achieved.

Greater Norwich Local Plan

- [Policy 3](#)

- Sets out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats;
- Recognises that conserving and enhancing the area's numerous heritage assets will continue to reinforce what makes Greater Norwich an attractive place to live in, work and visit;

The achieve this, the policy requires development to:

- Be designed to create a distinct sense of place and enhance local character taking account of local design and other guidance, undertaking a heritage impact assessment if significant impacts might arise, and providing measures such as heritage interpretation to further the understanding of local heritage issues;
- Avoid harm to designated and non-designated heritage assets and historic character, unless there are overriding benefits from the development that outweigh that harm or loss and the harm has been minimised;
- Provide a continued or new use for heritage assets whilst retaining their historic significance.

Furthermore, sites allocated in the plan are required to protect and enhance the local built and historic environment.

It is noted that HE have made representations on the Regulation 19 Publication version of the GNLP stating concerns over the evidence base for the plan, particularly in relation to tall building proposals in Norwich City Centre. These will no doubt be a matter of debate at the plan's examination. Notwithstanding this, there has been ongoing engagement and cooperation between the organisations on the protection of the nationally significant built and historic environment of the Greater Norwich area.

In the light of the above information, please could Historic England confirm that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met.

Please could you respond to this email within 6 weeks i.e. by 6th May 2021.
Thank you in advance for your help with this matter.

Regards,
Mike Burrell,
Greater Norwich Planning Policy Team Manager.

Greater Norwich Local Plan

Homes England

Dear Mike

Thanks for this.

We are fully engaged with the East Norwich project.

We are also engaged in ongoing discussions with the relevant local authorities on other strategic opportunities such as Broadland Growth Triangle, Anglia Square and other pipeline opportunities that may at some time be considered for Homes England support.

The Duty to Cooperate is met and we are not aware of other matters which require consideration in the GNLP.

Kind regards

Carlton

Carlton Roberts-James MRTPI FCIHT

Senior Manager – Partnerships & Business Development
High Growth Markets & New Settlements

Markets | Partners | Places



Northstowe House, Rampton Road, Longstanton, Cambridge, CB24 3EN

Please forward any Freedom of Information Requests to:

#MakingHomesHappen

We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)



Greater Norwich Local Plan

Dear Sir or Madam,

I am emailing Homes England (HE) in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**.

The GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038, including the strategy for the amount, location and delivery of homes. The Greater Norwich Development Partnership, which includes the Broads Authority and Norfolk County Council (NCC), oversees production of the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk.

NCC, the Greater Norwich districts and the Broads Authority have worked with other partners to produce the [Norfolk Strategic Planning Framework \(NSPF\)](#). The NSPF is a strategic document which provides a Statement of Common Ground for Norfolk district planning authorities which meets many of the requirements of the Duty to Cooperate. In particular it sets out that Norfolk planning authorities will meet their own housing needs within their own areas. The Greater Norwich authorities have committed to meeting the Local Housing Needs of the three districts through the GNLP.

The Greater Norwich authorities and HE have had ongoing engagement over the East Norwich site, which has the potential to provide 4,000 of the homes in the GNLP and 6,000 jobs. HE is a key stakeholder given its remit to accelerate housing delivery nationally. HE staff have been positively engaged in the development of key project documents for the broad partnership of public and private sector bodies which has been established to bring forward this key brownfield regeneration site. The partnership will develop a masterplan which will both evidence and support implementation of the site through its status as Strategic Regeneration Site and the allocation of the site in the GNLP.

In the light of the above information, please could Homes England confirm that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met.

Please could you respond to this email within 6 weeks i.e. by 7th May 2021.

Greater Norwich Local Plan

Natural England

Confirmation that the DtC has been met, in response to email below (sent March 2021) is awaited. Representations (not in relation to DtC) were submitted by Natural England at the Reg 19 stage of the Plan and a Statement of Common Ground between the Greater Norwich authorities and Natural England is being produced for these, including discussion of the GIRAMS.

Dear Louise,

I am emailing you as our main contact at Natural England in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**.

As you are aware, the GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038, including the strategy for environmental protection and enhancement. The Greater Norwich Development Partnership, which includes the Broads Authority and Norfolk County Council (NCC), oversees production of the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk.

The Greater Norwich districts, NCC and the Broads Authority have also worked with other partners including Natural England (who are signatories to the document) to produce the [Norfolk Strategic Planning Framework](#) (NSPF). The NSPF is a strategic document which provides a Statement of Common Ground for Norfolk district planning authorities which meets the requirements of the Duty to Cooperate.

Natural England is acknowledged within the document as having played a key role in the production of the framework, including making significant contributions to working groups.

The main issues Natural England has assisted in developing strategic cross boundary policy approaches for which have been incorporated in the GNLP are:

1. Green infrastructure (GI). Page 73 of the NSPF states *“As part of producing this Framework the authorities have commenced work on producing a GI strategy for Norfolk working with the Environment Agency, Natural England and Wild Anglia. This has produced:*
 - *Accessible public open space and Countryside Access maps;*
 - *Ecological Network Maps;*
 - *Identified potential Green Infrastructure Corridors throughout the county (the ‘GI network’).*
2. Protecting and enhancing designated natural habitats, especially in relation to visitor pressure and water quality.

Greater Norwich Local Plan

- Further to the work on the NSPF, Natural England has contributed to the production of the GNLP throughout the plan making process through:
- responses to the Regulation 18 consultations
- assisting in developing the evidence base (especially in relation to the Habitats Regulation Assessment and the Water Cycle Study affecting issue 2 above),
- input on the sustainability appraisal.

Reflecting the agreements in the NSPF and the content of the National Planning Policy Framework and legislation, the publication version of the GNLP seeks to protect and enhance the environment in a number of ways. This includes the vision which seeks “*significant further improvements to our extensive green infrastructure network*”, and policies 1, 2, 3, 4 and 7 of the GNLP which support further development of the green infrastructure network to provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats.

More specifically:

- [Policy 2](#) requires
 - Water efficiency and protection of water quality to protect habitats, particularly in the Broads;
 - On-site GI provision to link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4.
- [Policy 3](#)
 - Based on the NSPF work, supporting text and maps set out the GI network which is to be further developed and enhanced through the plan to 2038 (see maps [8A and 8B](#)). With significant involvement from Natural England, enhancement of the GI network has now been in development in Greater Norwich for over a decade in accordance with the Greater Norwich Green Infrastructure Strategy and delivery plans, and other documents such as the River Wensum Strategy;
 - Sets a tariff for housebuilders (GIRAMS) as part of the strategy to address issues related to visitor pressure on protected habitats;
 - Requires biodiversity net gain on all development.
- [Policy 4](#) on strategic infrastructure provides further support for enhancing the GI network, stating “*In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in maps 8A and B*”.

Furthermore, sites allocated in the plan are required to enhance GI, with particular opportunities for enhancement identified.

Greater Norwich Local Plan

In the light of the above information, please could Natural England confirm that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met.

Please could you respond to this email within 6 weeks i.e. by 4th May 2021.

Thank you in advance for your help with this matter.

Greater Norwich Local Plan

Office of Rail and Road (ORR)

No response has been received to any correspondence to the ORR on the GNLP. The following email was sent in March 2021:

I am emailing the Office of Rail and Road in relation to the **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**. The GNLP contains the emerging planning strategy and site allocations for the districts of Broadland, Norwich and South Norfolk from 2018 to 2038.

Norfolk County Council (NCC) are the local highways authority which produce transport plans for the area and are part of the Greater Norwich partnership producing the GNLP. The GNLP will be adopted by Broadland, Norwich and South Norfolk.

NCC and the Greater Norwich districts have also been involved with the production of the [Norfolk Strategic Planning Framework](#) (NSPF). This is a strategic document which provides a Statement of Common Ground for Norfolk district planning authorities which meets the requirements of the Duty to Cooperate. The NSPF supports improvements to the railway and road network in Greater Norwich and the rest of Norfolk (see section 7.7 in the linked document above, starting on page 65). Planned Highways England trunk road improvements in Greater Norwich on the A47, including the junction with the A11 which will assist bringing forward GNLP allocated sites, are referenced in this document. Partnership working with Network Rail and service providers on improved services from Norwich to Cambridge and London are also referenced in the NSPF.

[Policy 4](#) of the publication version of the GNLP supports the transport plans, projects and agreements produced by Highways England, NCC and Network Rail. The recent completion of the A1270 Broadland Northway road has improved access to the north of Norwich, Norwich Airport and North Norfolk, and will assist in bringing forward significant growth to the North East of Norwich which forms part of overall growth in the GNLP.

Policy 4 of the GNLP includes support for:

- Transport improvements which embrace new technologies and develop the role of Norwich as the regional capital and support strategic growth in the Cambridge Norwich Tech Corridor (the road and rail corridor with the potential for economic growth linking the cities);
- A47 improvements (Highways England – shown on the GNLP [Key Diagram](#) as Road Improvement Schemes and junction improvements);
- An A140 Long Stratton bypass (NCC - shown on the GNLP [Key Diagram](#));
- Enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail link and innovative use of the local rail network (rail companies and Network Rail);

Greater Norwich Local Plan

- Continued investigation of and support for rail freight opportunities;
- The growth and regional significance of Norwich Airport;
- Implementation of the Transport for Norwich Strategy including:
 - significant improvements to sustainable travel to promote modal shift;
 - developing the role of the park and ride system;
 - and delivery of the Norwich Western Link road (NCC - shown on the GNLP [Key Diagram](#)).

Network Rail and Highways England have provided supportive responses to consultations on the GNLP and have not stated that there are any strategic cross boundary issues which have been excluded from the plan. Your organisation was consulted at the Regulation 18 draft plan stage in early 2020, but did not respond.

In the light of the above information, please could you provide a response to the following specific question:

Since the partners, which include the highways authority (Norfolk County Council) have worked closely in recent years with Highways England, Network Rail and other transport bodies which have raised no strategic objections to the Greater Norwich Local Plan, please could the Office for Rail and Road confirm that there are no outstanding cross boundary strategic issues to be addressed by the GNLP and that the requirements of the Duty to Cooperate have been met.

Please could you respond to this email within 6 weeks i.e. by 4th May 2021.

Greater Norwich Local Plan

Suffolk County Council

No response has been received to any correspondence to the Suffolk County Council on the GNLP. The following email was sent.

From: Appleyard, Isabel

Sent: 08 January 2021 09:25

To: James Cutting

Subject: Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage - Duty to Cooperate - Statement of Common Ground (SCG)

Dear James,

Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage Duty to Cooperate – Statement of Common Ground (SCG)

This email is intended firstly to notify you that the Greater Norwich Local Plan (GNLP) Regulation 19 Publication Stage pre-submission draft plan is scheduled to be published on the Greater Norwich website at www.gnlp.org.uk between 1st February 2021 and 15th March 2021. Greater Norwich consists of Broadland, Norwich and South Norfolk, working with Norfolk County Council and the Broads Authority. When adopted, the GNLP will provide the planning strategy for the three districts from 2018 to 2038 and allocate many of the sites to assist in implementing that strategy.

Secondly, in relation to Duty to Cooperate requirements as we move towards examination on the plan, the GNLP team seeks to confirm the following:

1. Your authority is satisfied that the Norfolk Strategic Planning Framework (NSPF), including the Norfolk -Suffolk authorities member and officer meetings organised through the NSPF, have covered strategic cross boundary planning issues as far as they relate to Greater Norwich and *Suffolk County Council*. If you agree with this, please could you confirm that there are no outstanding strategic planning issues to be addressed.
2. The overall plan-making process for the GNLP has enabled effective engagement for your local authority with Greater Norwich.

Thank you in advance for your response on this matter.

I would be grateful if you could please reply by **15 March 2021**.

Regards,

Isabel Appleyard on behalf of Mike Burrell, Greater Norwich Planning Policy Team Manager

The Greater Norwich Local Plan

Growing Stronger Communities Together

gnlp@norfolk.gov.uk

Greater Norwich Local Plan



Greater Norwich Local Plan

East Suffolk

No response has been received to any correspondence to the East Suffolk on the GNLP. The following email was sent.

Dear Desi,

Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage Duty to Cooperate – Statement of Common Ground (SCG)

This email is intended firstly to notify you that the Greater Norwich Local Plan (GNLP) Regulation 19 Publication Stage pre-submission draft plan is scheduled to be published on the Greater Norwich website at www.gnlp.org.uk between 1st February 2021 and 15th March 2021. Greater Norwich consists of Broadland, Norwich and South Norfolk, working with Norfolk County Council and the Broads Authority. When adopted, the GNLP will provide the planning strategy for the three districts from 2018 to 2038 and allocate many of the sites to assist in implementing that strategy.

Secondly, in relation to Duty to Cooperate requirements as we move towards examination on the plan, the GNLP team seeks to confirm the following:

1. Your authority is satisfied that the Norfolk Strategic Planning Framework (NSPF), including the Norfolk -Suffolk authorities member and officer meetings organised through the NSPF, have covered strategic cross boundary planning issues as far as they relate to Greater Norwich and East Suffolk. If you agree with this, please could you confirm that there are no outstanding strategic planning issues to be addressed.
2. The overall plan-making process for the GNLP has enabled effective engagement for your local authority with Greater Norwich.

Thank you in advance for your response on this matter.

I would be grateful if you could please reply by **15 March 2021**.

Kind Regards,

Isabel Appleyard on behalf of Mike Burrell, Greater Norwich Planning Policy Team Manager

General Enquiries Tel: (01603) 306603

GNLP@norfolk.gov.uk www.greaternorwichlocalplan.org.uk/

Greater Norwich Local Plan

The Greater Norwich Local Plan

Growing Stronger Communities Together

gnlp@norfolk.gov.uk

IS BEING PRODUCED BY



Greater Norwich Local Plan

Great Yarmouth Borough Council Response to Reg 18 – Consultation

Mr Andrew Parnell, Strategic Planner

Received: **12/03/2020 via Email**

The Strategic Planning team welcomes the document and would support the Greater Norwich Local Plan (GNLP) Team on reaching this important stage of plan production. They would agree that this is an appropriate strategy and that it should comply with the updated 2019 NPPF. Strategic Planning would also agree that the document is in conformity with the aims and agreements of the Norfolk Strategic Planning Framework.

Strategic Planning would note the references within the Strategy document which relate to Great Yarmouth and would suggest that the strategic links to Great Yarmouth are strengthened and the importance of the offshore energy sector, related growth opportunities and tourism industry in Great Yarmouth are made more explicit. This is particularly so with the full duelling of the A47 which is supported by our local authorities through the A47 alliance.

Overall Strategic Planning would have no further comments to make on the documents at this time, but would reserve the right to comment on future stages of the plan production.

Greater Norwich Local Plan

King's Lynn and West Norfolk

No response has been received to any correspondence to the King's Lynn and West Norfolk on the GNLP. The following email was sent.

From: Appleyard, Isabel

Sent: 17 February 2021 13:59

To: Gomm, Alan

Subject: Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage - Duty to Cooperate - Statement of Common Ground

Dear Alan,

Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage Duty to Cooperate – Statement of Common Ground (SCG)

This email is intended firstly to notify you that the Greater Norwich Local Plan (GNLP) Regulation 19 Publication Stage pre-submission draft plan has been published on the Greater Norwich website at www.gnlp.org.uk 1st February 2021 to 15th March 2021. Greater Norwich consists of Broadland, Norwich and South Norfolk, working with Norfolk County Council and the Broads Authority. When adopted, the GNLP will provide the planning strategy for the three districts from 2018 to 2038 and allocate many of the sites to assist in implementing that strategy.

Secondly, in relation to Duty to Cooperate requirements as we move towards examination on the plan, the GNLP team seeks to confirm the following:

1. Your authority is satisfied that the Norfolk Strategic Planning Framework (NSPF), including the Norfolk -Suffolk authorities member and officer meetings organised through the NSPF, have covered strategic cross boundary planning issues as far as they relate to Greater Norwich and King's Lynn and West Norfolk. If you agree with this, please could you confirm that there are no outstanding strategic planning issues to be addressed.
2. The overall plan-making process for the GNLP has enabled effective engagement for your local authority with Greater Norwich.

Thank you in advance for your response on this matter.
I would be grateful if you could please reply by **15 March 2021**.

Regards,

Isabel Appleyard on behalf of Mike Burrell, Greater Norwich Planning Policy Team Manager

Isabel Appleyard, MRTPI
Senior Planning Officer (Policy)
Greater Norwich Local Plan Team (GNLP)

Greater Norwich Local Plan



General Enquiries Tel: (01603) 306603
GNLP@norfolk.gov.uk www.greaternorwichlocalplan.org.uk/

The Greater Norwich Local Plan

Growing Stronger Communities Together

gnlp@norfolk.gov.uk

IS BEING PRODUCED BY



Greater Norwich Local Plan

Breckland District Council – (confirmation awaited)

DTC STATEMENT		DATE 29/07/2021
---------------	--	--------------------

Greater Norwich Local Plan

Highway England – (confirmation awaited)

DTC STATEMENT		DATE 29/07/2021
---------------	--	--------------------

Greater Norwich Local Plan

Norfolk County Council – (confirmation awaited)

Greater Norwich Local Plan

Appendix 4 - Statement of Common Ground with Wild Anglia (in progress)

DTC STATEMENT		DATE 29/07/2021
---------------	--	--------------------

Greater Norwich Local Plan

Appendix 5 - Statement of Common Ground with Marine Management Organisation (MMO) (in progress)

Greater Norwich Local Plan

Appendix 6 – Statement of Common Ground with Breckland DC (in progress)