

# Greater Norwich Local Plan

## Statement of Compliance with the Duty to Cooperate

Statement of Compliance with the Duty to Cooperate.....	i
<b>Summary .....</b>	<b>1</b>
<b>1.0 Purpose.....</b>	<b>1</b>
<b>2.0 Introduction .....</b>	<b>1</b>
<b>3.0 The Strategic Context for the GNLP .....</b>	<b>3</b>
Spatial Vision and shared objectives .....	6
Summary of Cooperation .....	7
The Norfolk Strategic Planning Framework (NSPF): Statement of Common Ground.....	7
NSPF Coverage – Parties Involved .....	8
The Norfolk Strategic Planning Officers Group (NSPG).....	10
Liaison with regional organisations .....	10
Greater Norwich Boards.....	11
<b>4.0 Strategic Planning Issues, Joint Evidence Base and Cooperation with Duty to Cooperate Bodies.....</b>	<b>11</b>
Housing.....	13
Economy .....	17
Infrastructure/ Transport / Education / Utilities .....	21
Health.....	27
Climate Change: including Flood Risk / Water / Energy Efficiency .....	30
Natural Environment .....	35
Historic Environment.....	39
Norfolk County Council Minerals and Waste.....	41
<b>5.0 Conclusions.....</b>	<b>41</b>
GNLP – Prescribed Bodies under Duty to Cooperate Status .....	42
<b>6.0 Appendices.....</b>	<b>45</b>
Appendix 1 Norfolk Strategic Planning Framework (NSPF): Shared Spatial Objectives for Growing County and Statement of Common Ground (SCG) (2021) Agreements.....	45
Appendix 2 - Norfolk Strategic Planning Framework (NSPF): Shared Spatial Objectives for a Growing County and Statement of Common Ground (SCG) (2019) - Agreements .....	51
Appendix 3 - Breckland District Council Statement of Common Ground.....	55
Appendix 4 - Wild Anglia Statement of Common Ground .....	67

# Greater Norwich Local Plan

Appendix 5 - Marine Management Organisation (MMO) Statement of Common Ground .....	86
Appendix 6 – Emails Confirmations (extracts) - D to C – Prescribed bodies.....	96
6a) Babergh District Council & Mid Suffolk District Council.....	97
6b) Broads Authority .....	99
6c) Civil Aviation Authority (CAA).....	102
6d) Environment Agency.....	104
6e) Health (STP) .....	107
6f) Historic England.....	111
6g) Homes England .....	114
6h) Natural England .....	116
6i) Office of Rail and Road (ORR).....	121
6j) North Norfolk District Council .....	123
6k) Suffolk County Council.....	126
6l) East Suffolk.....	127
6m) Great Yarmouth Borough Council .....	128
6n) King's Lynn and West Norfolk.....	129
6p) Highway England.....	131
6q) Highway Authority - Norfolk County Council .....	133

# 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.

## 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 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.

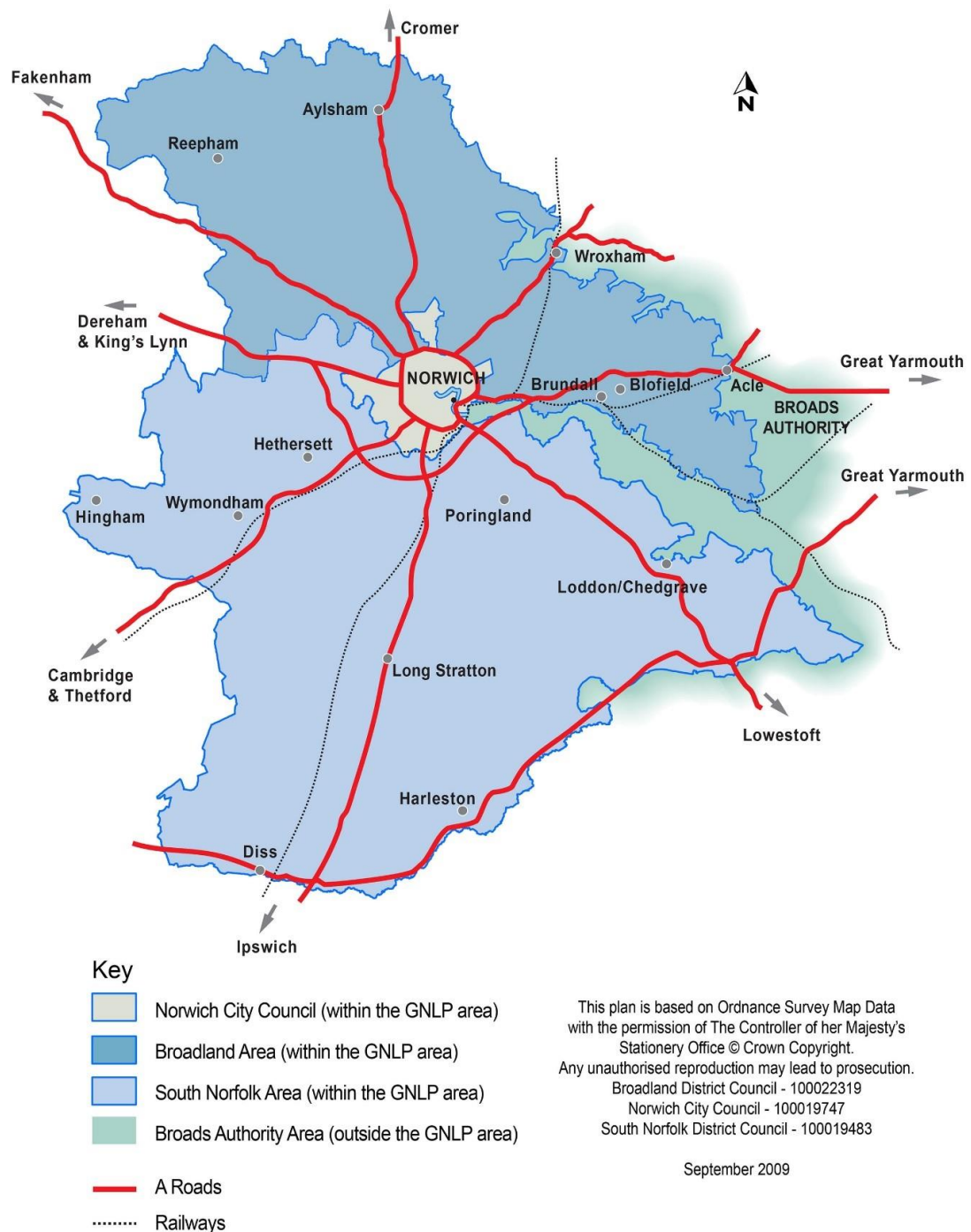
3.4 The GNLP will supersede the current JCS and the Site Allocations Plans in each of the three districts, except for the smaller villages in South Norfolk in which residential site allocations will be addressed through a new South Norfolk Village Clusters Housing Allocations Local Plan and the Diss, Scole and Burston area, for which a Neighbourhood Plan is being produced which will

# Greater Norwich Local Plan

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;

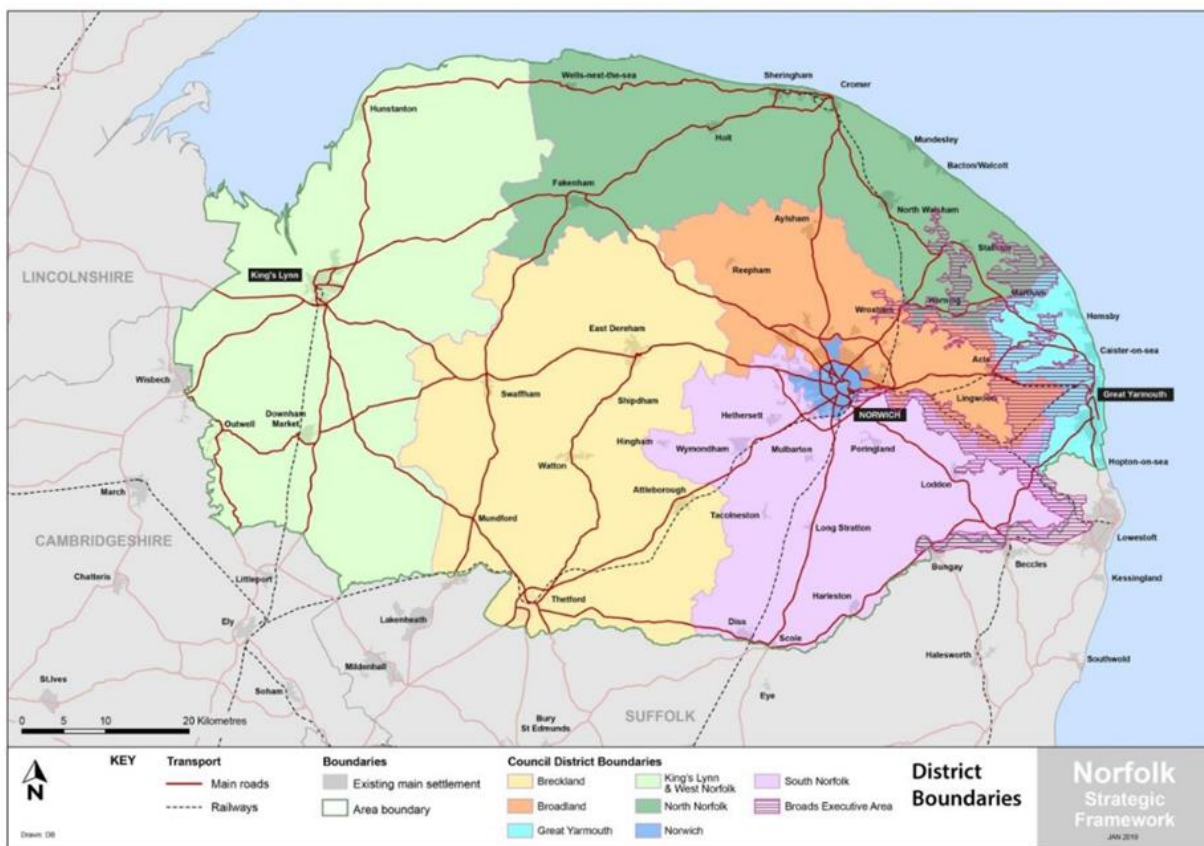
- The housing needs of the elderly and the types of accommodation required;
- The actions that LPAs can take to help mitigate and adapt to climate change;
- A new health section to highlight the importance of health provision and healthy living as a strategic cross boundary issue;
- Shared guidance on the roll 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](http://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 section below.



# Greater Norwich Local Plan

## Housing

### Strategic Planning Issue

- 4.3 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)

- 4.4 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



# Greater Norwich Local Plan

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)**

- 4.5 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)**

- 4.6 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.
- 4.7 **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

# Greater Norwich Local Plan

dwellers within the Greater Norwich area). At the time of writing, further work is being undertaken to update this evidence of need

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

- 4.8 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.
- 4.9 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.
- 4.10 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

- 4.11 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

# Greater Norwich Local Plan

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 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

4.12 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

# Greater Norwich Local Plan

## Economy

### Strategic Planning Issue:

- 4.13 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

- 4.14 **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.

## Summary of Evidence

### Regional Economic Strategies

- 4.15 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).

### East of England Forecasting Model (EEFM).

- 4.16 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 Local Plan

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

4.17 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**

4.18 The 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).

4.19 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.

4.20 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**

#### **EEFM Forecast Model**

4.21 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.

4.22 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

# Greater Norwich Local Plan

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.

4.23 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 –

4.24 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.

4.25 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)

4.26 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.

# Greater Norwich Local Plan

## Ongoing cooperation

4.27 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). 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.



# Greater Norwich Local Plan

## Infrastructure/ Transport / Education / Utilities

### Strategic Planning Issue-

- 4.28 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 DtC

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

- 4.29 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.

- 4.30 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

- 4.31 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

# Greater Norwich Local Plan

investment strategies and programmes. See GNLP Strategy Appendix 1- Infrastructure Requirements.

- 4.32 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 Regulation18 draft plan stage in early 2020, but did not respond and has not responded to more recent contact (see Conclusions and appendix 3). In the light of the above information, the GNLP have cooperated directly with these bodies.
- 4.33 [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.
- 4.34 Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences.
- 4.35 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.
- 4.36 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.
- 4.37 [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.
- 4.38 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

# Greater Norwich Local Plan

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

- 4.39 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:

# Greater Norwich Local Plan

## Outcomes set out in the GNLP

- 4.40 [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.
- 4.41 [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.
- 4.42 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](#)).
- 4.43 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.
- 4.44 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.

# Greater Norwich Local Plan

## Outcomes from strategic working

- 4.45 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.
- 4.46 **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

- 4.47 Norfolk County Council is responsible for planning for education infrastructure. Evidence in the GNLPIR shows that school capacity to serve growth will be met both by improvements to existing schools and through new schools being provided.
- 4.48 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.
- 4.49 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.
- 4.50 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.
- 4.51 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.

# Greater Norwich Local Plan

4.52 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.

4.53 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.

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

4.55 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

4.56 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 DtC

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

4.58 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

4.59 [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.

4.60 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



# Greater Norwich Local Plan

has been updated to take into account of the emergence of the NHS Sustainability and Transformation Partnership (STP).

- 4.61 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.
- 4.62 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.
- 4.63 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

- 4.64 **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.
- 4.65 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

4.66 **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**

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

# Greater Norwich Local Plan

## Climate Change: including Flood Risk / Water / Energy Efficiency

### Strategic Planning Issues:

4.68 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 DtC

**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)

4.69 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. SFRAs 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 Local Plan

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

4.70 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)**

4.71 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)**

4.72 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 section below rather than in this section.

## **Outcome set out in the NSPF**

**NSPF Agreement 3** (*relevant section*) - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk

# Greater Norwich Local Plan

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

4.73 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

# Greater Norwich Local Plan

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

4.74 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:

4.75 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.

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

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

## Flood Risk:

4.78 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.

4.79 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

# Greater Norwich Local Plan

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:

4.80 **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

4.81 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

4.82 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 .



# Greater Norwich Local Plan

## Natural Environment

### Strategic Planning Issue

4.83 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 DtC

**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

4.84 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.

4.85 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.

# Greater Norwich Local Plan

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

4.87 **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.

4.88 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.

4.89 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.

4.90 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).

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

4.92 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

# Greater Norwich Local Plan

- 4.93 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.

## Outcomes set out in the NSPF

**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
- 4.94 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.

## Outcomes set out in the GNLP

- 4.95 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;

# Greater Norwich Local Plan

- 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.

## 4.96 [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

4.97 Cooperation will be ongoing through the review of the NSPF and GNLP. See SCG with MMO – (see Appendix 5 and response from Natural England - Appendix 6h)

# Greater Norwich Local Plan

## Historic Environment

### Strategic Planning Issue

4.98 Conservation and enhancement of the historic environment including mitigation and adaptation through policy development.

### Evidence Base-

HIA - Heritage Impact Assessments for Site Policies (see Items B10 Evidence base – Key Sites

### Strategic Partners D to C

[HIA](#) - Historic England

[Housing and Economic Land Availability Assessment \(HELAA\)](#) – The GNLP consulted with Norfolk County Council (Historic Environment) on historic environment along with conservation officers within the GNLP for Sites considered thought the HELAA process and Site Assessments.

### Actions

4.99 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. In addition, proposed additional modifications have been agreed where required.

### Outcome set out in the GNLP

4.100 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:

4.101 [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;

# Greater Norwich Local Plan

- Provide a Sustainability Statement to show, among other things, how the above will be achieved.

## 4.102 [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.

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

4.104 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 (SA)**

4.105 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

# Greater Norwich Local Plan

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

4.106 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

## Norfolk County Council Minerals and Waste

4.107 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:

1. 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)
2. GNLP Call for Sites (July 2016)
3. GNLP Site Proposals and Growth Options Consultation – including the Interim SA Report for GNLP Reg 18 (A) (January to March 2018)
4. GNLP New Revised and Small Sites Consultation- Reg. 18 (B) (October to December 2018).



5. 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).
  6. 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 6 set out in some detail how the main issues of concern to the different prescribed bodies have been addressed through the NSPF and 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 section below.

## **GNLP – Prescribed Bodies under Duty to Cooperate Status**

1. Environment Agency - Confirmation received that D to C has been met and there are no strategic issues outstanding. (See Appendix 6d)
2. Historic England - Confirmation received that D to C has been met and there are no strategic issues outstanding (See Appendix 6e)
3. Natural England – confirmation that D to C has been met and there are no strategic issues outstanding. (See Appendix 6h)
4. Civil Aviation Authority (CAA) -Confirmation received that D to C has been met and there are no strategic issues outstanding. (see Appendix 6c)
5. Homes England - Confirmation received that D to C has been met through ongoing collaboration on East Norwich, Anglia Square and other opportunities. (see Appendix 6g)

# Greater Norwich Local Plan

6. 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 6e)
7. The Office of Road and Rail - No response received therefore it is assumed that there are no objections in this regard. (See Appendix 6i).
8. Great Yarmouth Borough Council - Support that D to C has been met through the NSPF and GNLP consultations – no outstanding strategic issues. (See Appendix 6n).
9. Kings Lynn and West Norfolk BC -No response received therefore it is assumed that there are no objections in this regard. (See Appendix 6m).
10. 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 6a).
11. East Suffolk DC: No response received therefore it is assumed that there are no objections in this regard. (See Appendix 6l).
12. Suffolk County Council: No response received therefore it is assumed that there are no objections in this regard. (See Appendix 6k).
13. North Norfolk DC: No response received despite reminders sent, therefore it is assumed that there are no objections in this regard. (See Appendix 6j).
14. Broads Authority National Park - Support that D to C has been met through the NSPF and GNLP consultations – no outstanding strategic issues. (See Appendix 6b).
15. Norfolk County Council – Confirmation received that the D to C has been addressed through the NSPF and the role of Norfolk County Council in producing the GNLP. (See Appendix 6q)
16. Highways England - confirmation. (See Appendix 6p)
17. Wild Anglia - Comments received under D to C post Reg. 19. (see SCG Appendix 4).
18. 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 to the East Marine Plans). (See Appendix 5 SCG).
19. Breckland DC (See SCG Appendix 3)

# Greater Norwich Local Plan

- 5.6 The GNLP team and GNDP members have worked with a wide range of 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 Inspectors 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

## 6.0 Appendices

### 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

# Greater Norwich Local Plan

## 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 21<sup>st</sup> 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 Authorities<sup>1</sup>, 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**

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- 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

## Appendix 3 - Breckland District Council Statement of Common Ground

### Greater Norwich Local Plan - Statement of Common Ground

#### The Purpose of the Statement

1. This statement has been prepared to inform the Inspectors of agreements made between:

**Broadland District Council, Norwich City Council and South Norfolk,  
working together with Norfolk County Council and the Broads Authority  
as the Greater Norwich Development Partnership (GNDP)**

#### **And Breckland District Council**

It is in respect of Breckland's representations on the Greater Norwich Local Plan (GNLP).

2. The statement sets out the agreed position of the two parties in relation to the representations made. It provides agreements between the organisations which complement the Norfolk Strategic Planning Framework (NSPF) Statement of Common Ground which the authorities have already signed.
3. By committing the parties to further co-operative work combining with and in addition to work already undertaken and ongoing through the NSPF, this Statement of Common Ground addresses both the representations made and the Duty to Cooperate concerns raised on the Greater Norwich Local Plan (GNLP) by Breckland District Council.

#### **Breckland's representations**

4. Breckland District Council's Regulation 19 representations on the GNLP cover strategic cross boundary issues relating to:
  - Power supplies;
  - Water resources, both supply and waste management;
  - Economic development – specifically the strategic focus of the GNLP on the Cambridge Norwich Tech Corridor and the potential for economic synergies;
  - The potential new settlements in the next Greater Norwich local plan.

#### **Co-operation to date**

5. Co-operation on strategic cross-boundary issues relevant to all Norfolk Local Authorities has taken place and is planned to continue into the future. This has taken place and will continue primarily through the NSPF covering strategic cross-boundary issues, meeting the requirements of the Duty to Cooperate. In addition, other forums which the organisations engage with address strategic



# Greater Norwich Local Plan

implementation issues such as the New Anglia LEP, the Cambridge Norwich Tech Corridor Partnership and Water Resources East. Critically, these include significant work with the utility providers which are responsible for water and power supplies. However, it is recognised that there will be a requirement for bilateral meetings between neighbouring authorities outside the NSPF to discuss specific cross-boundary issues which are outside the scope of the interests of the other NSPF Local Authorities.

6. In addition, the emerging GNLP covers the issues of concern appropriately for a strategic planning document, as detailed in appendix 1 below.

## **Agreements**

7. The Greater Norwich authorities and Breckland District Council agree to work together through the Norfolk Strategic Planning Framework (NSPF) in relation to those issues which are relevant to all Norfolk Local Authorities. The Greater Norwich authorities and Breckland District Council also agree to work outside the NSPF on specific cross boundary issues which are of particular relevance to both authorities which include, but are not limited to:

## **Power Supplies**

The Greater Norwich authorities and Breckland will:

- Lobby UK Power Networks to provide power supply infrastructure to meet growth needs set out in our local plans in line with emerging Greater Norwich Local Plan (GNLP) policy 4;
- Continue to actively pursue improvements to power supplies through the NSPF and other forums;
- Support the development of sustainable local energy sources in suitable locations as promoted by the GNLP and the Breckland Local Plan.

## **Water Supplies**

The Greater Norwich authorities and Breckland will:

- Work collaboratively as part of Water Resources East (WRE) to enable the successful co-creation of WRE's wider Regional Plan in line with agreement 21 of the NSPF (2021).
- Work collaboratively and share evidence with reference to the impact of cumulative growth of development from both local plans.

# Greater Norwich Local Plan

- Continue to actively pursue water efficiency improvements in line with agreement 22 of the NSPF (2021) and through other forums, including investigating the potential for lobbying government for higher water efficiency standards to once again be allowed to be applied through local plans.
- Lobby for implementation of Anglian Water's Water Resources Management Plan and other relevant plans covering water resources and wastewater in line with emerging GNLP policy 4 and agreement 23 of the NSPF (2021).

## **Economic Development**

The Greater Norwich authorities and Breckland District Council will work on promoting economic synergies. Implementation of the strategic employment locations identified as tier 1 employment sites in the Cambridge Norwich Tech Corridor in agreement 9 of the NSPF and in local plans in Breckland and Greater Norwich will be the priority for co-operative work between both authorities.

## **New Settlements**

The Greater Norwich authorities will engage with Breckland District Council on new settlements in the Greater Norwich area both directly with each other and through the Norfolk Strategic Planning Framework when work is undertaken on progressing such settlements as part of the next planning strategy for Greater Norwich. Initial discussions between the Greater Norwich authorities and Breckland District Council on the proposed new settlements in the GNLP will be progressed within 9 months following the signature of the Statement of Common Ground. The Greater Norwich authorities will appraise Breckland District Council of the work progressed to date for the potential settlements identified at Honingham Thorpe, Hethel and Silfield.

Appendix 1 set out the justification for the agreements. (see below)

## Appendix 1 - The justification for the agreements

### Power

#### Background

1. The relevant utility provider for the area, UK Power Networks (UKPN), does not invest in specific new infrastructure on the basis of growth set out in local plans. The company requires much greater certainty of development and its timing. The key actions for the local planning authorities are thus to work with them both on plan-making to inform the company in advance of where growth will take place, but more significantly on implementation. The initial version of the NSPF, which was agreed in 2019, the update agreed in 2021 and the draft GNLP all provide the context for successful implementation.

#### NSPF coverage

2. The NSPF (2021) emphasises the need for the LPAs to work closely with UKPN to secure the strategic network enhancements needed for new development. The NSPF states “Partners continue to work with UKPN to overcome current constraints and prevent future issues, and to explore mechanisms to ensure the cost of electricity infrastructure is shared proportionately between planned developments”. UKPN attend meetings, providing the opportunity to raise issues and working groups have been established.
3. Current UKPN business plans run from 2015/16 – 2022/23, with work having begun on the regional development plans beyond 22/23. Energy master planning on the Tech Corridor is a recognised concern under consideration by a number of UKPN partners, including New Anglia LEP, South Norfolk, Breckland, West Suffolk and the Greater South East Energy Hub.
4. Capacity issues within the power network generally relate to substation capacity. The NSPF (2021) highlights a number of relevant energy projects to address capacity issues in both Breckland and Greater Norwich including:
  - a. enhancements already being provided, with more planned, serving the Snetterton Employment area;
  - b. the Attleborough Energy Supply as a major scheme;
  - c. Upgrades to the Cringleford Primary substation.

# Greater Norwich Local Plan

## GNLP coverage

5. As recommended by the NSPF and Greater Norwich's energy study, GNLP policy 2 promotes new developments which:
- minimise energy use;
  - minimise reliance on non-renewable or high-carbon energy sources;
  - promote the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies

Further to this, GNLP policy 4 commits Greater Norwich to work with UKPN to ensure that investment decisions help promote growth and overcome constraints and there are forward looking decisions on energy investment.

Further evidence is being produced by Norfolk and Suffolk County on the cumulative effects on power from proposed development.

## Power Supplies Agreement

The Greater Norwich authorities and Breckland will:

- Lobby UK Power Networks to provide power supply infrastructure to meet growth needs set out in our local plans in line with emerging Greater Norwich Local Plan (GNLP) policy 4;
- Continue to actively pursue improvements to power supplies through the NSPF and other forums;
- Support the development of sustainable local energy sources in suitable locations as promoted by the GNLP and the Breckland Local Plan.

## Water

6. With policy having been introduced through the JCS in 2011, the efficient use of water resources has long been and remains a priority for strategic planning in Greater Norwich. Breckland's Local Plan also prioritises efficient use of water resources.

## Anglian Water Plans

7. Anglian Water (AW) is responsible for the water supply in the vast majority of Breckland and Greater Norwich. AW has planned for growth needs from 2020 to 2045, taking account of local plan growth totals and locations. Modelling for sustainable water supplies to meet growth needs has been done through Anglian Water's Water Resources Management Plan (WRMP - December 2019).

# Greater Norwich Local Plan

8. In relation to water resources, the WRMP states (page 18):

“The Norfolk area is mainly in surplus for the entire plan .....There is adequate surplus resource to allow a local transfer between neighbouring WRZs (i.e. Water Resource Zones).
9. The WRMP strategy (page 17) accordingly plans for a local water supply transfer from the Norwich and the Broads WRZ, which covers much of Greater Norwich, to the Norfolk Rural North WRZ, which covers much of Breckland. It also plans for transfers between the River Wensum and Wymondham to serve growth. Significantly for our local plans, the WRMP places a major focus on water efficiency.
10. In addition, Anglian Water:
  - a. Is developing short term water-related Covid-19 recovery interventions and will establish a partnership structure known as a “Water Fund” to facilitate delivery of nature-based solutions for water management in the medium and long term. Agreement 21 of the NSPF (2021) commits the LPAs to be part of this work.
  - b. Has a Water Recycling Long-Term Plan which highlights the investment needed over the next 25-years to balance the supply and demand for water recycling.
  - c. Is preparing a Drainage and Wastewater Management Plan with Stakeholders to be published in 2022.

## Water Resources East

11. Water Resources East has been established to provide further co-ordination on water resources and growth, with its aims including promoting water efficiency and producing a single, multi-sector Regional Plan for Eastern England. The organisation is a signatory to the NSPF.

## NSPF coverage

12. The 2019 and 2021 NSPF state that local plans should contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day). Accordingly, Agreement 22 of the NSPF (2021) expects that this standard will be included in local plans, as well as encouraging the use of BREEAM standards for non-residential developments. Agreement 23 commits the authorities to work together on development to ensure it is aligned with water and waste-water infrastructure.
13. The NSPF also highlights that Anglian Water’s aim is to see residential developers go beyond the optional higher water efficiency standard and in time to move to water neutrality.

# Greater Norwich Local Plan

14. Further emphasising the shared commitment to address water supply issues, a Norfolk Water Strategy is now in production.

## **GNLP coverage**

15. The need for water efficiency policies resulting from the WRMP and the NSPF are highlighted in the emerging GNLP. The justification and criteria for the GNLP water efficiency policy are set out in table 8 (section 9), with the water efficiency requirement in policy 2 (section 9).
16. These are the most demanding water efficiency standards for new development government currently allows to be set through local plans. In line with the more demanding water efficiency standards previously set in Greater Norwich through the JCS and Anglian Water's promotion of water neutrality in new development, GNLP policy 2 supports higher standards being applied if government once again allows this.
17. With input from Breckland officers on growth in Breckland, a Water Cycle Study has been produced as evidence for the GNLP to highlight local water supply and recycling issues.

## **Water Agreement**

The Greater Norwich authorities and Breckland will:

- Work collaboratively as part of Water Resources East (WRE) to enable the successful co-creation of WRE's wider Regional Plan in line with agreement 21 of the NSPF (2021).
- Work collaboratively and share evidence with reference to the impact of cumulative growth of development from both local plans.
- Continue to actively pursue water efficiency improvements in line with agreement 22 of the NSPF (2021) and through other forums, including investigating the potential for lobbying government for higher water efficiency standards to once again be allowed to be applied through local plans.
- Lobby for implementation of Anglian Water's Water Resources Management Plan and other relevant plans covering water resources and wastewater in line with emerging GNLP policy 4 and agreement 23 of the NSPF (2021).

## **Economic Development**

18. Growth in both Breckland's adopted local plan and the emerging GNLP has been considered in the light of the mutually agreed strategic context, namely:

# Greater Norwich Local Plan

- a. Sub regional priorities of the New Anglia LEP to grow the Cambridge Norwich Tech Corridor (see map 1 below), which includes core areas close to the A11 and the Norwich to Ely railway in both Breckland and Greater Norwich. Further to this, the Tech Corridor initiative itself, which Greater Norwich and Breckland are signatories to, has been important in informing GNLP strategy.
  - b. The content of the Breckland Local Plan which, in line with strategic commitments, focuses significant housing growth at Thetford and Attleborough and supports the expansion of the Thetford and Snetterton employment areas.
  - c. Agreement 9 of the NSPF (2021) which focusses on strategic employment growth at Tier 1 Employment Sites and the promotion of the Cambridge Norwich Technology Corridor in section 5.4 on key cross-boundary issues in relation to the economy.
19. Three of the strategic employment growth sites in the NSPF (2021) are in Breckland at:
- Thetford Enterprise Park;
  - Snetterton and
  - Attleborough.
20. Seven are in Greater Norwich at:
- Hethel Engineering;
  - Wymondham (Browick Interchange);
  - Norwich Research Park;
  - Norwich City Centre;
  - Norwich Airport;
  - the Food Enterprise Zone at Honingham and
  - Broadland Business Park/Broadland Gate.
21. The synergies in the Cambridge Norwich Tech Corridor are reflected in the Tech Corridor initiative, LEP strategies, the NSPF (2021) and in turn in the GNLP. Significant growth in digital creative industries in Norwich city centre and in health, life sciences, agri and bio-technology at the Norwich Research Park and the Food Enterprise Park at Honingham, along with advanced manufacturing and engineering at Hethel, are planned through the GNLP. These are intended to grow in tandem with employment growth in Breckland.

## **GNLP policy**

22. Accordingly, paragraph 17 of the draft GNLP states:



# Greater Norwich Local Plan

At the regional level important 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. These set the context for economic growth.

23. Policy 1 and the Key Diagram of the emerging GNLP (see map 2 below) therefore identify both a Strategic Growth Area for employment and housing growth and the strategic employment sites identified above. Policy 6 identifies the scale of growth anticipated at these sites to 2038, along with their main employment uses, with Site Allocations policies mapping them in detail.

## **Economic Development Agreement**

The Greater Norwich authorities and Breckland District Council will work on promoting economic synergies. Implementation of the strategic employment locations identified as tier 1 employment sites in the Cambridge Norwich Tech Corridor in agreement 9 of the NSPF (2021) and in local plans in Breckland and Greater Norwich will be the priority for co-operative work.

# Greater Norwich Local Plan

Map 1 Cambridge Norwich Tech Corridor



## CAMBRIDGE NORWICH TECH CORRIDOR

With over 20 science and research parks, a range of business parks and over 560HA of development sites for employment use, the Cambridge Norwich Tech Corridor offers a range of opportunities for businesses to grow and thrive.

### OUR CLUSTERS:

-  Agritech, Agrifood, Genetics & Bio Science
-  IT, AI, Robotics, Digital, Sensors & Big data
-  Advanced Engineering, Manufacturing & Materials
-  Life Science, Medtech & Pharma

### 100KM OF OPPORTUNITY

#### OUR ASSETS:

-  Advanced Engineering, Manufacturing & Materials
-  IT, AI, Robotics, Digital, Sensors & Big data
-  Agritech, Agrifood, Genetics & Bio Science
-  Life Science, Medtech & Pharma
-  Education
-  Energy
-  Enterprise Zones

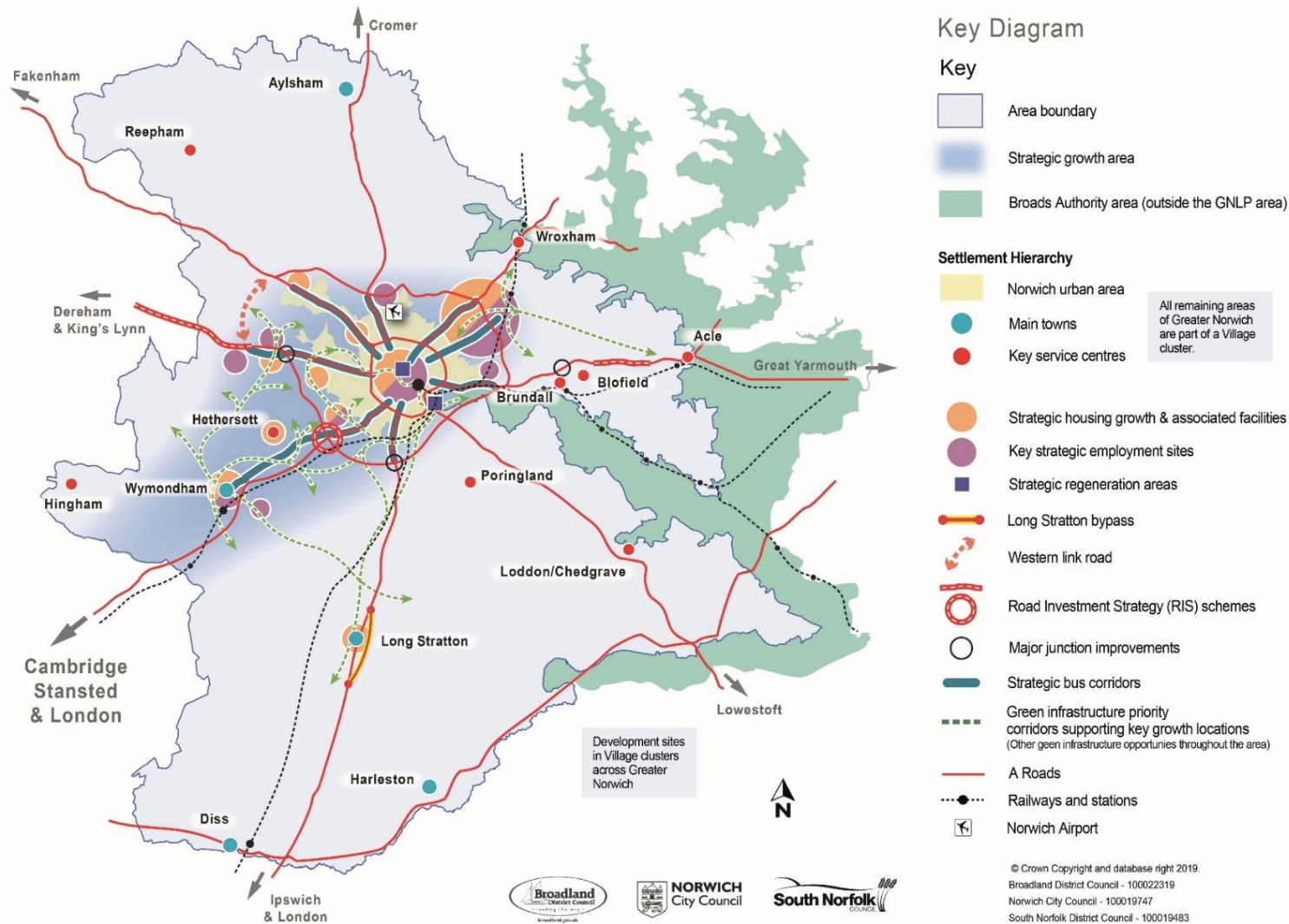


DTC STATEMENT

DATE  
29/10/2021

# Greater Norwich Local Plan

Map 2 Emerging GNLP Key Diagram



DTC STATEMENT

DATE  
29/10/2021

# Greater Norwich Local Plan

## The future potential for new settlements in the next local plan

### GNLP policy

24. The GNLP strategy states that:

- (para. 165): A significant part of long-term (housing) need is likely to be met in a future plan through the development of new settlements (see policy 7.6).
- (para. 400) Three new settlement sites have been proposed through the GNLP (at Honingham Thorpe, Hethel and Silfield). These will be investigated along with other potential locations in the next plan, taking account of selected criteria.

25. Further to this, Policy 7.6 – Preparing for New Settlements states:

*Subject to the outcome of evidence, assessment and appraisal, one or more new settlements will be brought forward in the next Local Plan.*

26. The draft GNLP therefore commits to the principle of a new settlement or settlements through the next plan. No decisions on locations have been made at this stage, though the three sites currently proposed through consultation on the GNLP are within the Cambridge Norwich Tech Corridor.

### New Settlements Agreement

The Greater Norwich authorities will engage with Breckland District Council on new settlements in the Greater Norwich area both directly with each other and through the Norfolk Strategic Planning Framework when work is undertaken on progressing such settlements as part of the next planning strategy for Greater Norwich. Initial discussions between the Greater Norwich authorities and Breckland District Council on the proposed new settlements in the GNLP will be progressed within 9 months following the signature of the Statement of Common Ground. The Greater Norwich authorities will appraise Breckland District Council of the work progressed to date for the potential settlements identified at Honingham Thorpe, Hethel and Silfield .

### Statement of Common Ground Signatories

Signed by Michael Burrell, Greater Norwich Planning Policy Team Manager, on behalf of the Greater Norwich Development Partnership

14th September 2021

Signed by Robert Walker, Executive Director Place and Delivery on behalf of Breckland District Council

23 September 2021

# Greater Norwich Local Plan

## Appendix 4 - Wild Anglia Statement of Common Ground

### Greater Norwich Local Plan Statement of Common Ground with Wild Anglia

Comments made under Duty to Co-operate

Date: 15/09/2021



**NORWICH**  
City Council



Working with



**Norfolk** County Council



# Greater Norwich Local Plan

## Purpose of Statement

1. This document has been prepared to inform the Inspectors of the agreed position between GNLP and Wild Anglia in respect of comments made by Wild Anglia under the role of “Duty to Co-operate”. It is intended to address certain specific points that have been made by Wild Anglia and, as such, should be read in conjunction with the Greater Norwich Duty to Co-operate Statement.

## Background

2. Wild Anglia are the Local Nature Partnership for Norfolk and Suffolk, having been awarded the status by the Government in 2012, and include a range of partners with an interest in wildlife and the environment. The duty to co-operate in relation to planning for sustainable development (Section 33A of the Planning and Compulsory Purchas Act 2004 as amended) applies to the Local Nature Partnership as it does to local planning authorities.
3. A key element of the Statement of Common Ground on the Duty to Co-operate is provided through the Norfolk Strategic Planning Framework, an overarching statement of common ground on the duty to co-operate for all the Norfolk local planning authorities and other partners. Wild Anglia is acknowledged within the document as having played a key role in the production of the framework, particularly in relation to 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’).*Hence, Wild Anglia’s support for and input into the enhancement of the strategic GI network has been made clear through the NSPF. Partner organisations have also been involved, with significant engagement on strategic environmental issues having taken place with Natural England and the Environment Agency in relation to both evidence production and policy formulation for the GNLP on environmental issues. Norfolk Wildlife Trust has also engaged at all stages of the plan-making process.
4. Wild Anglia have been consulted during the production of the GNLP. No formal representations were submitted on the consultations but following correspondence in relation to the duty to co-operate, Wild Anglia raised a number of points for consideration by the GNLP authorities.
5. A summary of each of these points together with the GNLP authorities’ response including any potential change to the Plan, and the Wild Anglia response to this, is set out in the appended table.

## Conclusion

6. The response of the GNLP authorities to points raised by Wild Anglia in its role under the Duty to Co-operate is set out in the appended table. The Inspectors are asked to consider this in assessing the soundness of the Plan, and in determining whether any modifications might be necessary to make the Plan sound.

On behalf of GNLP authorities:  
Mike Burrell  
GNLP Team Manager

On behalf of Wild Anglia:  
Richard Powell  
Chair of Wild Anglia



# Greater Norwich Local Plan

## APPENDIX 1 Table of summary of points raised by Wild Anglia under DtC role and responses

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
Policy 2	In regard to policy 2, mention is made of multifunctional greenspace and good descriptions of landscape character access and amenity planting, but we would recommend inclusion of greater interconnectivity of surrounding green landscapes managed under the new ELMS scheme for farmers so that green corridors could be either encouraged or remain if land is bought for development so keeping much of the nature corridor and connectivity. Much of the issue today is that developments cut off the	The GNLP contains strategic policies and does not go into the level of detail that might be found in other local plans, such as Development Management Policy Local Plans. Policy 2 sets out considerations for achieving sustainable communities and as such refers to the provision of green infrastructure, requiring development to: <i>“Contribute to multi-functional green infrastructure links,</i>	See proposed change to supporting text in response to representation from Natural England (rep 24473) set out in Council response.	Our response would be that in the light of the IPCC report on climate change released in August that GI becomes even more important. Trees for temperature control and pollution absorption as well as well thought out and implemented SUD's become even more critical as we prepare to adapt to climate change not mitigate. Adaptation becomes critical in how the infrastructures in these new developments work and operate, as temperature rises and climate

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	connectivity of invertebrate and floristic byways and policy committing to encourage these would be recommended. For example, many villages and communities now are encouraging Bee Lines and wildflower corridors; it is very encouraging that communities have embraced these measures and we think emphasis on encouraging enhancing and developing these for any new community and development should be on the developer to design and deliver and this needs to be mentioned in the GNLP. We need to learn from the isolation and cutting of lines and communities of the past such as the NDR and East Norwich	<i>including through landscaping, to make best use of site characteristics and integrate into the surroundings, having regard to relevant green infrastructure strategies and delivery plans".</i> It does not, and should not, attempt to list all the potential measures and initiatives that may be relevant to any development proposal. However, the policy does seek to ensure that development contributes to green infrastructure links and integrates these into the surroundings, and as such the policy will support		disruption intensifies the way developments handle that for the sake of their occupants is key. The present measures of once a developer builds the properties and is able to walk away and pass all responsibility for flooding as an example to the public sector needs addressing. The way the planning of the development in the first place is effected and driven by climate change adaptation is becoming more to the forefront. I think in a new plan like GNLP needs to be at the forefront of change and not be afraid to be a pioneer in the new development needs

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	developments and not make these mistakes again.	<p>the creation and enhancement of GI networks, as sought by Wild Anglia. When a developer purchases a piece of land and submits a planning application for development, the policy will be a main consideration (together with other relevant policies)</p> <p>Under the policy the existing wildlife networks, and the potential for improvements, will be factors in achieving the GI links that are required.</p> <p>Related to this a change to the plan is proposed by the GN authorities in response</p>		<p>of the people as much as the developer</p> <p>It is disappointing to read in our response so many 'No Change' this is not progressive we must not allow developments to be the 'retro fit' issues of the future, we have the knowledge the science and the effects now in many scientific reports they need to be implemented into plans going forward not left and they may be too difficult.</p> <p>The IPCC report especially but also the Governments Environment Bill should be</p>

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
		<p>to a representation by Natural England (rep 24473):</p> <p>Amend explanatory text under Table 8 Issue 3 as a minor modification, adding:</p> <p><i>“Where it is not possible to deliver sufficient quality GI on-site it will need to be provided off-site nearby, either directly by the developer or through a financial contribution to deliver it”;</i></p> <p><i>and</i></p> <p><i>“The aim is to provide an overall strengthening of GI networks, which will entail avoiding loss or severance</i></p>		<p>the basis of the GNLP and the future development needs and criteria going forward and should form a key part of the final agreed strategy.</p>

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
		<p><i>and the enhancement of existing GI networks, as well as creating new elements”.</i></p> <p>It is felt that no further changes are necessary in relation to this point.</p>		
Policy 3	Policy 3 is good but can easily be seen in isolation from other policies for example 2 above. Greater emphasis on integration of policies and reference to polices would be advantageous. So many times, policies are seen as individual when in fact they are integral to a plan. Often the bigger picture is missed with opportunities for better planning, development and design is created when policies are looked	The policies in the GNLP are part of an overall Development Plan, that includes other existing local plans as well as the GNLP when adopted. In addition, national planning policies also apply. In determining a planning application for development all relevant policies should be taken into consideration.	No change	

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	at as complementary rather than individual opportunities and sometimes damage can occur when policies conflict. What is seen as a small loss of habitat or honed habitat corridor in one development as OK when the bigger picture is reviewed, and the compound small damage is accounted for it forms a large-scale loss or damage. Whole life planning and whole scheme planning is important as one development whatever the size impacts on another and this is seen in water resources, noise light pollution and environmental damage but also in lack of connectivity in communities with green infrastructure which can impinge on quality of life and	Consequently, under the planning system no planning policy is seen in isolation. The GNLP is, indeed, the “big picture” in terms of planning for future development in the Greater Norwich area. Similarly, in considering the allocation of sites for development, sites are seen as part of an overall strategy, and has had regard to issues such as GI infrastructure and connectivity. However, the Plan can only apply to development, it does not deal with wider related GI and wildlife matters that may be appropriately addressed by other means		

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	<p>mental health and wellbeing. Therefore, a plan like the GNLP should be seen as a whole not as small individual plans and the policies associated with this should be big picture and held to account.</p> <p>The green infrastructure corridors referred to in the plan are the minimum not the maximum and great effort in the plans policies should be to ensure they are joined up by developers and designers rather than just left to river corridors and natural planting the urban conurbations in between the lines on say Map 8B should be thin green lines of urban planning wildflower verges</p>	<p>e.g. GI Strategies, Nature recovery networks etc.</p> <p>Further discussion relating to integration of policies is contained in the response under Policy 4.</p> <p>In terms of GI corridors and links, see response under Policy 2, including proposed text for clarification.</p> <p>Map 8B in the Plan is just a strategic diagrammatic representation of GI corridors, it does not attempt to illustrate all relevant corridors. Further</p>		



# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	and better verge management which is missing from the plan. Again, it is the interconnectivity of place and community to health and wellbeing. Studies show wildflower verges aid mental health and feeling of wellbeing and these should be as important as river valleys and corridors.	detail is contained in other documents such as the GN GI Study (2020).  Verge management is not development and therefore cannot be addressed in the Local Plan.		
Policy 4	Policy 4 should again be an integration. Nothing is mentioned about reinstatement or enhancing when large infrastructure is planned and built. When a road or pipeline goes through the landscape, effort should be made to reinstate to a higher biological value than low grade arable. Long	The GNLP includes a vision which seeks “significant further improvements to our extensive green infrastructure network”, and policies 1, 2, 3, 4 and 7 which support further development of the green	No change	

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	<p>Stratton Bypass mentioned I am sure would be very welcome but a proper cut and remove wildflower meadow edge for 20 years post opening would enhance the biodiversity create bigger corridors and create health and wellbeing. Great use of cut and collect from road edges gives spin off benefits of jobs to mow, composting and biogas development opportunities in local communities or in larger scale plants such as Whitlingham or Beccles etc. The design of the long Stratton bypass should be to include this biodiversity gain rather than plain standard road x which is what we are used to today; we need to be planning for the future not building for yesterday.</p>	<p>infrastructure network to provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• Policy 1 provides the over-arching strategy.</li> <li>• Policy 2 requires 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.</li> </ul>		

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
		<ul style="list-style-type: none"> <li>• 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. 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. In addition, further evidence work is being considered to identify GI priority further</li> </ul>		

DTC STATEMENT

DATE  
29/10/2021

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
		<p>into the future. The policy also requires biodiversity net gain on all development.</p> <ul style="list-style-type: none"> <li>• 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”.</li> </ul> <p>Furthermore, sites allocated in the plan are required to enhance GI, with particular</p>		

DTC STATEMENT

DATE  
29/10/2021

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
		<p>opportunities for enhancement identified.</p> <p>Overall, it is felt that the Plan provides an appropriate and adequate level of detail suitable for a strategic local plan.</p> <p>Maintenance of road verges such as the Long Stratton Bypass would be the responsibility of the Highway Authority and not controlled by the Local Plan.</p>		

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
General point	In terms of answering the question related to cross-boundary issues again reading the GNLP submission Wild Anglia would list the issues; water resources, climate change, air quality, green infrastructure, modal transport etc. but it is the integration of these that is missing in the plan.	As discussed previously, the policies should not be seen in isolation but as part of a whole strategy. This commences with the vision and objectives set out in Section 3 of the plan, and is taken forward through all the policies in conjunction, with Policy 1 The Sustainable Growth Strategy being the “over-arching” policy.	No change	
General point	With regard to mentioning the N&S Environment strategy, we would suggest to be technically accurate there is no strategy at the moment and therefore in planning terms the GNLP can have no regard, however the N&S environmental Compendium	Paras 15-21 of the GNLP explain how the GNLP fits with other planning bodies and strategies It is accepted that it would be useful to also refer to the Natural Capital Evidence Compendium for Norfolk	Add to Para 17: <i>“In terms of environmental issues the Natural Capital Evidence Compendium for Norfolk and</i>	

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	completed by UEA for the Norfolk and Suffolk Environmental strategy whenever that is produced is relevant as an evidence base and we would expect to have this included this unless of course any of the evidence does not enhance or add value to the environmental standards and opportunities that could be offered but this should not necessarily be the case. So, we recommend referencing the compendium.	and Suffolk (Oct 2020) produced as part of the preparatory work that will feed into a Norfolk & Suffolk 25 Year Environment Plan. Therefore, it is proposed that a factual correction be made to the supporting text at para 17 as a minor modification.  The Compendium has been included in the evidence base	<i>Suffolk (Oct 2020) produced as part of the preparatory work that will feed into a Norfolk &amp; Suffolk 25 Year Environment Plan, sets out information on environmental assets and the risks to them</i> , as a minor modification for clarification.	
General point	Wild Anglia would recommend reference the Norfolk Strategic Framework as this is an adopted document by all of the local	The Norfolk Strategic Planning Framework is referenced at para 18 of the GNLP. Full regard has	No change	



# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
	authorities in Norfolk, validated by each cabinet and should act as supporting evidence. The NSPF contains a range of commitments to all of the above cross boundary issues.	e had to the NSPF in producing the GNLP.		
General point	In summary Wild Anglia would like to see reference to the onus on developers to deliver against the Norfolk and Suffolk green infrastructure strategies and climate change emergency planning. This should take greater provenance in the plan than it does at the moment.	As discussed in the responses above the GNLP addresses GI and climate change issues as key issues through its vision and objectives and the strategic policies contained in the GNLP.  Overall, it is felt that the Plan provides an appropriate and adequate	No change	

DTC STATEMENT

DATE  
29/10/2021

# Greater Norwich Local Plan

POLICY/ MAP/ PARA NO. etc	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	WILD ANGLIA RESPONSE
		level of detail suitable for a strategic local plan, setting out proportionate and justifiable requirements on development.		

# Greater Norwich Local Plan

## Appendix 5 - Marine Management Organisation (MMO) Statement of Common Ground

### Greater Norwich Local Plan Statement of Common Ground with the Marine Management Organisation (MMO)

#### Comments made under Duty to Co-operate

Date: 01/09/2021



**NORWICH**  
City Council



Working with



**Norfolk** County Council

## Purpose of Statement

1. This document has been prepared to inform the Inspectors of the agreed position between GNLP and the Marine Management Organisation (MMO) in respect of comments made by the MMO under the role of “Duty to Co-operate”. It is intended to address certain specific points that have been made by the MMO and, as such, should be read in conjunction with the GNLP authorities’ general Statement of Compliance with the Duty to Co-operate, to which this statement is appended.

## Background

2. The MMO was created in 2009 by the Marine and Coastal Access Act and is an executive non-departmental public body sponsored by DEFRA. The MMO is tasked with producing Marine Plans which include setting out priorities and directions for future development within the plan area. The UK Marine Policy Statement (MPS) provides the policy framework for the marine planning system. It provides the context for marine plans. Marine plans put into practice the objectives for the marine environment that are identified in the MPS alongside the National Planning Policy Framework (NPPF) and the Localism Act 2011. Marine plans apply only in their area, but if a proposed activity may affect the plan area, this should be acknowledged and considered in applications and decision making. Although concerned with the marine environment, this includes tidal rivers. As such its jurisdiction extends into the Greater Norwich area, though much of this is within the area of the Broads Authority and so excluded from the GNLP area, and so there is the potential for a “strategic overlap” between the GNLP and the Marine Plans.
3. The duty to co-operate in relation to planning for sustainable development (Section 33A of the Planning and Compulsory Purchase Act 2004 as amended) applies to the MMO as it does to local planning authorities.
4. A key element of the Statement of compliance with the Duty to Co-operate is provided through the Norfolk Strategic Planning Framework, an overarching statement of common ground on the duty to co-operate for all the Norfolk local planning authorities and other partners. The MMO have been involved in this and NSPF Agreement 27 states: *Norfolk Authorities and the MMO agree that there are currently no strategic planning issues remaining to be resolved 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:*
  - Marine and coastal employment
  - Sustainable port development
  - Access for tourism and recreation/ sustainable fisheries in small harbour towns

# Greater Norwich Local Plan

- *AONB and Seascape enhancement*
- *Water quality/water supply and sewerage*
- *Climate change/ Coastal erosion and coastal change management*

5. In correspondence in relation to the duty to co-operate, the MMO advised that the GNLP should have regard to the East Inshore and East Offshore Marine Plans (April 2014) with some policies specifically identified as those suggested to be of relevance, whilst noting the East Marine Plans should be considered as a whole. All the policies in the East Marine Plans have been reviewed against the GNLP proposed policies by the GNLP team and no conflict between the plans has been identified. Table 1 below sets out this comparison. In considering a specific proposal, such as a planning application, the determination would still need to be in accordance with the GNLP and the East Marine Plans.
6. The MMO also made a specific representation to the GNLP Reg 19 stage on the soundness of the plan (ie not under the Duty to Co-operate) seeking a reference to the East Inshore and East Offshore Marine Plans within the introductory section of the GNLP. This is dealt with in a separate Statement of Common Ground on that representation.

## Conclusion

7. The response of the GNLP authorities to points raised by the MMO in its role under the Duty to Co-operate is set out above (together with table 1 below). Having regard to the potential strategic overlap referred to in paragraph 2, no conflicts between the GNLP and the East Marine Plans have been identified.
9. The MMO confirm that the conclusion above is acceptable to it and that there are no unresolved Duty to Co-operate issues.
10. The Inspectors are asked to consider this in assessing the soundness of the Plan, and in determining whether any modifications might be necessary to make the Plan sound.

On behalf of GNLP authorities:  
Mike Burrell  
GNLP Team Manager

On behalf of the Marine Management Organisation:

Katharine Ludford  
Marine Planning Manager

**Table 1 East Marine Plans and GNLP policies comparison by the GNLP team.**

## **East Marine Plans Policies**

**EC1** Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported

Relevant GNLP Policies – Policy 1, Policy 6. No conflicts identified.

**EC2** Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.

Relevant GNLP Policies – Policy 1, Policy 6. Employment site allocations. No conflicts identified.

**EC3** Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported.

Relevant GNLP Policies – Policy 2, Policy 4. No conflicts identified.

**SOC1** Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.

Relevant GNLP Policies – Policy 1, Policy 2, Policy 4, Policy 6. No conflicts identified.

**SOC2** Proposals that may affect heritage assets should demonstrate, in order of preference:

- a) that they will not compromise or harm elements which contribute to the significance of the heritage asset
- b) how, if there is compromise or harm to a heritage asset, this will be minimised
- c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or
- d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset

Relevant GNLP Policies – Policy 2, Policy 3. No conflicts identified.

**SOC3** Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:

- a) that they will not adversely impact the terrestrial and marine character of an area
- b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them
- c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impact

# Greater Norwich Local Plan

Relevant GNLP Policies - Policy 2. Policy 3. No conflicts identified.

**ECO1** Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan Implementation

Relevant GNLP Policies – Policy 2. Policy 3. No conflicts identified.

**ECO2** The risk of release of hazardous substances as a secondary effect due to any increased collision risk should be taken account of in proposals that require an authorisation.

Relevant GNLP Policies – Not applicable.

**BIO1** Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).

Relevant GNLP Policies – Policy 3. No conflicts identified.

**BIO2** Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.

Relevant GNLP Policies – Policy 2. Policy 3. No conflicts identified.

**MPA1** Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network

Relevant GNLP Policies – Policy 3. No conflicts identified.

**CC1** Proposals should take account of:

- how they may be impacted upon by, and respond to, climate change over their lifetime and
- how they may impact upon any climate change adaptation measures elsewhere during their lifetime

Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

Relevant GNLP Policies – Policy 1. Policy 2. No conflicts identified.

**CC2** Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal



# Greater Norwich Local Plan

Relevant GNLP Policies – Policy 1. Policy 2. No conflicts identified.

**GOV1** Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa

Relevant GNLP Policies – Policy 1. Policy 4. No conflicts identified.

**GOV2** Opportunities for co-existence should be maximised wherever possible

Relevant GNLP Policies – Policy 1. Policy 2. No conflicts identified.

**GOV3** Proposals should demonstrate in order of preference:

- a) that they will avoid displacement of other existing or authorised (but yet to be implemented) activities
- b) how, if there are adverse impacts resulting in displacement by the proposal, they will minimise them
- c) how, if the adverse impacts resulting in displacement by the proposal, cannot be minimised, they will be mitigated against or
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts of displacement.

**Relevant GNLP Policies – Not applicable.**

**DEF1** Proposals in or affecting Ministry of Defence Danger and Exercise Areas should not be authorised without agreement from the Ministry of Defence

**Relevant GNLP Policies – Not applicable**

**OG1** Proposals within areas with existing oil and gas production should not be authorised except where compatibility with oil and gas production and infrastructure can be satisfactorily demonstrated

**Relevant GNLP Policies – Not applicable**

**OG2** Proposals for new oil and gas activity should be supported over proposals for other development.

**Relevant GNLP Policies – Not applicable**

**WIND1** Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless

- a) they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm
- b) the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered

# Greater Norwich Local Plan

- c) the lease/agreement for lease has been terminated by the Secretary of State
- d) in other exceptional circumstance

## **Relevant GNLP Policies – Not applicable.**

**WIND2** Proposals for Offshore Wind Farms inside Round 3 zones, including relevant supporting projects and infrastructure, should be supported

Relevant GNLP Policies – Policy 1, Policy 4. No conflicts identified.

**TIDE1** In defined areas of identified tidal stream resource (see figure 16), proposals should demonstrate, in order of preference:

- a) that they will not compromise potential future development of a tidal stream project
- b) how, if there are any adverse impacts on potential tidal stream deployment, they will minimise them
- c) how, if the adverse impacts cannot be minimised, they will be mitigated
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impact

## **Relevant GNLP Policies – Not applicable**

**CCS1** Within defined areas of potential carbon dioxide storage, 191 (mapped in figure 17) proposals should demonstrate in order of preference:

- a) that they will not prevent carbon dioxide storage
- b) how, if there are adverse impacts on carbon dioxide storage, they will minimise them
- c) how, if the adverse impacts cannot be minimised, they will be mitigated
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts

## **Relevant GNLP Policies – Not applicable**

**CCS2** Carbon Capture and Storage proposals should demonstrate that consideration has been given to the re-use of existing oil and gas infrastructure rather than the installation of new infrastructure (either in depleted fields or in active fields via enhanced hydrocarbon recovery)

## **Relevant GNLP Policies – Not applicable**

**PS1** Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance should not be authorised in International Maritime Organization designated routes

Relevant GNLP Policies – Not applicable

# Greater Norwich Local Plan

**PS2** Proposals that require static sea surface infrastructure that encroaches upon important navigation routes (see figure 18) should not be authorised unless there are exceptional circumstances. Proposals should:

- a) be compatible with the need to maintain space for safe navigation, avoiding adverse economic impact<sup>201</sup>
- b) anticipate and provide for future safe navigational requirements where evidence and/or stakeholder input allows and
- c) account for impacts upon navigation in-combination with other existing and proposed activities<sup>20</sup>

Relevant GNLP Policies – Not applicable

**PS3** Proposals should demonstrate, in order of preference:

- a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours<sup>209</sup>
- b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this
- c) how, if the interference cannot be minimised, it will be mitigated
- d) the case for proceeding if it is not possible to minimise or mitigate the interference

Relevant GNLP Policies – Not applicable

**DD1** Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference

- a) that they will not adversely impact dredging and disposal activities
- b) how, if there are adverse impacts on dredging and disposal, they will minimise these
- c) how, if the adverse impacts cannot be minimised they will be mitigated
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts

Relevant GNLP Policies – Not applicable

**AGG1** Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised unless there are exceptional circumstances

Relevant GNLP Policies – Not applicable

**AGG2** Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is demonstrated that the other development or activity is compatible with aggregate extraction or there are exceptional circumstances.

Relevant GNLP Policies – Not applicable

# Greater Norwich Local Plan

**AGG3** Within defined areas of high potential aggregate resource, proposals should demonstrate in order of preference:

- a) that they will not, prevent aggregate extraction
- b) how, if there are adverse impacts on aggregate extraction, they will minimise these
- c) how, if the adverse impacts cannot be minimised, they will be mitigated
- d) the case for proceeding with the application if it is not possible to minimise or mitigate the adverse impacts

Relevant GNLP Policies – Not applicable

**CAB1** Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant.

Relevant GNLP Policies – Policy 1. Policy 4. No conflicts identified.

**FISH1** Within areas of fishing activity, proposals should demonstrate in order of preference:

- a) that they will not prevent fishing activities on, or access to, fishing grounds
- b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them
- c) how, if the adverse impacts cannot be minimised, they will be mitigated
- d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts.

Relevant GNLP Policies – Not applicable.

**FISH2** Proposals should demonstrate, in order of preference:

- a) that they will not have an adverse impact upon spawning and nursery areas and any associated habitat
- b) how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them
- c) how, if the adverse impacts cannot be minimised they will be mitigated
- d) the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts

Relevant GNLP Policies – Not applicable

**AQ1** Within sustainable aquaculture development sites (identified through research), proposals should demonstrate in order of preference:

- a) that they will avoid adverse impacts on future aquaculture development by altering the sea bed or water column in ways which would cause adverse impacts to aquaculture productivity or potential
- b) how, if there are adverse impacts on aquaculture development, they can be minimised
- c) how, if the adverse impacts cannot be minimised they will be mitigated

d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impact.

## **Relevant GNLP Policies – Not applicable**

**TR1** Proposals for development should demonstrate that during construction and operation,

in order of preference:

- a) they will not adversely impact tourism and recreation activities
- b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them
- c) how, if the adverse impacts cannot be minimised, they will be mitigated
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts.

Relevant GNLP Policies – Policy 6. No conflicts identified.

**TR2** Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference:

- a) that they will not adversely impact on recreational boating routes
- b) how, if there are adverse impacts on recreational boating routes, they will minimise them
- c) how, if the adverse impacts cannot be minimised, they will be mitigated
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impact.

Relevant GNLP Policies – Not applicable.

**TR3** Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported

Relevant GNLP Policies – Policy 1. Policy 6. No conflicts identified.

Nb. For GNLP Part 2 site allocation policies no conflicts with East Marine Plans policies were identified.

## Appendix 6 – 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 body 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.

# Greater Norwich Local Plan

## 6a) Babergh District Council & Mid Suffolk District Council

Dear Isabel

Thank you for your e-mail dated 8<sup>th</sup> 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](http://www.babergh.gov.uk) & [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

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](http://www.gnlp.org.uk) between 1<sup>st</sup> February 2021 and 15<sup>th</sup> 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.



# Greater Norwich Local Plan

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)**



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**The Greater Norwich Local Plan**  
Growing Stronger Communities Together  
[gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

# Greater Norwich Local Plan

## 6b) 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.
- 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

# Greater Norwich Local Plan

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.

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 6<sup>th</sup> 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.

# Greater Norwich Local Plan

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  
[gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)



# Greater Norwich Local Plan

## 6c) 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**  
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# Greater Norwich Local Plan

## 6d) 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)



Dear Liam,

DTC STATEMENT

DATE  
29/10/2021



# Greater Norwich Local Plan

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;
- 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.

# Greater Norwich Local Plan

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 4<sup>th</sup> 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

## 6e) Health (STP)

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

Dear Mike,

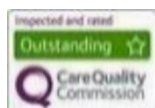
Your email sets out well the collaborative work done, and from the perspective of the Health partnership the Duty to Cooperate is met. You will be well aware that over the past few years we have worked hard with Planning authorities to re-position Health on the map and ensure it has profile alongside 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 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 6<sup>th</sup> 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

[gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Please email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) for all general enquiries.

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# Greater Norwich Local Plan

## 6f) 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 Inspectors.*

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 14<sup>th</sup> 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.
- [Policy 3](#)

# Greater Norwich Local Plan

- 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 6<sup>th</sup> 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

## 6g) 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 7<sup>th</sup> May 2021.

# Greater Norwich Local Plan

## 6h) Natural England

Confirmation that the DtC has been met, in response to email below. 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 has been produced for these, including discussion of the GIRAMS.

**From:** Oliver, Louise

**Sent:** 06 October 2021 16:57

**To:** Burrell, Mike

Hi Isabel and Mike

My apologies for the delay in responding to your previous emails.

On behalf of Natural England, I confirm that we are satisfied that the requirements of the Duty to Cooperate for the Greater Norwich Local Plan (GNLP) have been met, and at the time of writing, there are no outstanding cross boundary strategic issues to be addressed by the GNLP.

Regards

Louise Oliver

Louise Oliver  
Lead Adviser – Norfolk & Suffolk Team  
Natural England  
Dragonfly House  
2 Guilders Way  
Norfolk NR1 3UB  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

***I am currently working M-F, 9 am – 2 pm***

***Please send any consultations to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)***

During the current coronavirus situation, Natural England staff are working remotely and from some offices to provide our services and support our customers and stakeholders. Although some offices and our Mail Hub are now open, please continue to send any documents by email or contact us by phone to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

**Wash hands. Cover face. Make space. Fresh Air.**

# Greater Norwich Local Plan



We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

# Greater Norwich Local Plan

**From:** Burrell, Mike  
**Sent:** 23 March 2021 11:17  
**To:** Natural England

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.
  - 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



# Greater Norwich Local Plan

- 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.

**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.**

# Greater Norwich Local Plan

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

Thank you in advance for your help with this matter.

# Greater Norwich Local Plan

## 6i) 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);
- 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:

# Greater Norwich Local Plan

- 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 4<sup>th</sup> May 2021.

# Greater Norwich Local Plan

## 6j) North Norfolk District Council

No further responses received from correspondence to North Norfolk District Council on the GNLP. The following email was sent with follow up reminders

**From:** Burrell, Mike  
**Sent:** 07 October 2021 12:19  
**To:** Ashwell, Mark  
**Subject:** Greater Norwich D to C

Hi Mark,

Further to previous emails on confirmation of the DtC for the GNLP, can you please send us a confirmation that:

“North Norfolk District Council confirm that, in relation to North Norfolk, the requirements of the Duty to Co-operate have been met for the Greater Norwich Local Plan through the Norfolk Strategic Planning Framework and associated work, and that there are no outstanding cross boundary strategic issues related to North Norfolk to be addressed by the Greater Norwich Local Plan”; or something along those lines?

If possible, could you supply it in the next couple of days? We are finalising our DtC statement and need to submit it soon, hopefully next week.

Please feel free to phone me to discuss this if necessary.

Regards,

Mike Burrell,  
Greater Norwich Planning Policy Team Manager.

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[gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

**From:** Appleyard, Isabel  
**Sent:** 6 May, 2021  
**To:** Mark Ashwell  
**Subject:** Greater Norwich Local Plan (GNLP) – Regulation 19 Publication Stage - Duty to Cooperate – Statement of Common Ground (SCG)

Hello Mark

Thank you for your email and willingness to work together to demonstrate DTC has been met with GNLP /NN.

DTC STATEMENT		DATE 29/10/2021
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# Greater Norwich Local Plan

We have been looking at the GYBC Examination which recently closed and their successful approach to demonstrating DTC has been met through reference to the NSPF. However, similar to GY the approach which we are taking is if there is an outstanding issue with a particular partner which has been reflected in their objection at Reg 19 then of course we are taking immediate action to prepare a joint SCG. In the case of NN, the issues which you referenced in your email below I would have thought again could be covered through the NSPF work unless there is something else we're not aware of.

1. Each authority content that others are addressing their needs. - NSFP
2. Joint settlement issues – Hoveton/Wroxham - NSPF
3. Joint approach to visitor pressure mitigation work. – GIRAMS (Work in progress) – NSPF to be finalised
4. Infrastructure capacity where we share roads, Water Recycling, School and health catchments. – NSPF

I note there has not been any formal comments submitted to the Reg. 19 from NN, therefore I would be grateful if you could please confirm the following:

1. That we have cooperated in full in the production GNLP through the NSPF: Statement of Common Ground and will continue to do so in the future.
2. That North Norfolk agree and confirm the above.

Many thanks  
Isabel

**From:** Appleyard, Isabel

**Sent:** 17 February 2021 14:02

**To:** Mark Ashwell

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

Dear Mark,

## **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](http://www.gnlp.org.uk) 1<sup>st</sup> February 2021 to 15<sup>th</sup> 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.

# Greater Norwich Local Plan

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 North Norfolk District. 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)**



Please note I work part time hrs.

**General Enquiries Tel: (01603) 306603**  
**[GNLP@norfolk.gov.uk](mailto:GNLP@norfolk.gov.uk)** **[www.greaternorwichlocalplan.org.uk/](http://www.greaternorwichlocalplan.org.uk/)**

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# Greater Norwich Local Plan

## 6k) Suffolk County Council

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

**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](http://www.gnlp.org.uk) between 1<sup>st</sup> February 2021 and 15<sup>th</sup> 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

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# Greater Norwich Local Plan

## 6I) East Suffolk

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

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](http://www.gnlp.org.uk) between 1<sup>st</sup> February 2021 and 15<sup>th</sup> 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**

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# Greater Norwich Local Plan

## 6m) 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.

No further comments received - GNLP

# Greater Norwich Local Plan

## 6n) 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 with follow up reminders.

**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](http://www.gnlp.org.uk) 1<sup>st</sup> February 2021 to 15<sup>th</sup> 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)**

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### IS BEING PRODUCED BY



# Greater Norwich Local Plan

## 6p) Highway England



Our ref:  
Your ref:

Mike Burrell  
Greater Norwich Planning Policy Team Manager

Emma Wood Operations –  
East Woodlands Manton Lane  
Bedford MK41 7LW

16<sup>th</sup> September 2021

Dear Mike

### **Duty to Cooperate for the Greater Norwich Local Plan (GNLP)**

Thank you for your correspondence. Unfortunately, at the time of your regulation 18 consultation I was new to post and could not find evidence of having been consulted. Upon contacting your GNLP inbox the team informed me that unfortunately the consultation period had ended. We would always look to engage to be able to best represent the needs of the Strategic Road Network (SRN), and apologise that we did not fulfil our duty to engage at that time.

Highways England have interest in developments that impact on the SRN (including the A11 and A47 trunk roads) to ensure safe and efficient operation with the proposed development. Where there is a need to implement interventions to our existing highway infrastructure, it is important to understand that there is sufficient capacity, and any mitigation can be accommodated. Therefore, it is prudent to engage with the Local Plan process to ensure this. In terms of policy 4, notwithstanding the Highways England schemes proposed, we have good working relations with your transport team at Norfolk County Council, as well as other strategic partners, and strong involvement in all of the schemes mentioned.

In terms of the specific question you raise in this correspondence:

# Greater Norwich Local Plan

**Since the partners, which include the highways authority (Norfolk County Council), have worked closely in recent years with Highways England and other transport bodies which have raised no strategic objections to the Greater Norwich Local Plan, please could Highways 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.**

Highways England does not consider that there are any outstanding cross boundary strategic issues to be addressed by the GNLP, and agree that the requirements of the Duty to Cooperate have been met.

We look forward to working with you to understand the impacts of the proposed allocations on the SRN and to continuing to work with the Greater Norwich Local Planteam as your plan progresses through to adoption.

Yours sincerely

Emma Wood  
Spatial  
Planner  
Operations  
(East)



# Greater Norwich Local Plan

## 6q) Highway Authority - Norfolk County Council

From: Muspratt, Vince  
Sent: 24 September, 2021  
To: Burrell, Mike  
Subject: Greater Norwich Local Plan

Dear Mike

This is to confirm that the duty to cooperate with Norfolk County Council is fulfilled through our membership of the GNDP and active support on the production of the GNLP at both Member and officer levels.

Regards

Vince

**Vince Muspratt, Director Growth and Economic Development**  
CES  
County Hall



**Norfolk** County Council



# Greater Norwich Local Plan

From: Burrell, Mike  
Sent: 21 July 2021 09:36  
To: Highways England  
Subject: Greater Norwich Local Plan

Dear Sir or Madam,

I am emailing Highways England 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 2021 [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 road network in Greater Norwich and the rest of Norfolk (see section 9.7 in the linked document above, starting on page 81). 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.

[Policy 4](#) of the publication version of the GNLP supports the transport plans, projects and agreements produced by Highways England and NCC. 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);
- Continued investigation of and support for rail freight opportunities;

# Greater Norwich Local Plan

- 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](#)).

Highways England have previously provided supportive responses to consultations at the Regulation 18 stage of the GNLP and have not made representations at the Regulation 19 stage or stated that there are any strategic cross boundary issues which have been excluded from the plan.

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 and other transport bodies which have raised no strategic objections to the Greater Norwich Local Plan, please could Highways 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 by mid-September 2021.

Thank you in advance for your help with this matter.

Regards,

Mike Burrell,  
Greater Norwich Planning Policy Team Manager.

Tel: 01603 222761

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# Greater Norwich Local Plan

DTC STATEMENT		DATE
		29/10/2021