

Greater Norwich Local Plan
Statement of Common Ground with
Natural England

Representations on GNLP Part 1 –
Strategic Policies

Date: 16/12/2021

Purpose of Statement

1. This document has been prepared to inform the Inspectors of the agreed position between the GNLP authorities and Natural England in respect of Natural England's representations on the GNLP (Part 1 Strategic Policies).

Background

2. Natural England are a consultee on the Plan and the GNLP authorities have discussed with Natural England issues raised by them, including objections relating to the soundness of the Plan made at the Regulation 19 stage. The GNLP authorities have considered these representations and produced a response to them. For a number of the representations the GNLP authorities consider that a "minor" additional modification could usefully be made to the Plan and that this does not relate to its "soundness"; for example, a change for clarification purposes, and that this could overcome Natural England's concerns. For other representations the GNLP authorities consider that the Plan is appropriately worded at present and is "sound", and that no modification is necessary; though in some instances the authorities would not object to a wording change being made as a "main" modification if the Inspectors deemed it necessary to make the Plan sound.

3. A summary of each representation, together with the GNLP authorities' response including any potential change to the Plan, and the Natural England response to this, is set out in the table at Appendix 1. The areas of agreement or remaining disagreement are also highlighted.

4. A particular point of discussion has been the proposed Green Infrastructure Recreational Impact and Avoidance Strategy (GIRAMS) that is referred to in policy 3 of the GNLP and is intended to address potential visitor pressure on European status wildlife sites that might arise from residential development and, as such, is of relevance to the Habitat Regulations Assessment (HRA) of the GNLP. The GIRAMS is a Norfolk-wide document produced under the Norfolk Strategic Planning Forum that comprises all the local planning authorities and other bodies, including Natural England. It identifies a package of measures that are deemed necessary and appropriate to address the potential visitor impacts on European status sites. The GIRAMS is proposed to be adopted by all the Norfolk local planning authorities (except the Minerals and Waste Ipa) though this process has not yet been completed. Also, it is intended that the GIRAMS and its application will be reviewed in order to ensure that it is effective. Accordingly, an Interim Statement on this issue was produced and agreed by the Greater Norwich authorities and Natural England and published on the evidence base website. This is contained at Appendix 2. A revised Statement on the GIRAMS is currently being produced. This has been agreed in principle, subject to ratification, by the Norfolk Ipas as a "joint statement". It is also to be considered by Natural England. If agreed, it will supersede the Interim Statement. Work is also progressing on the governance arrangements for taking forward the GIRAMS.

Conclusion

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5. The position of the GNLP authorities and Natural England on representations made by Natural England to the GNLP Reg 19 Proposed Submission document is set out in the appended table. The Inspectors are asked to consider these 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 Natural England:

Louise Oliver

Lead Adviser – Norfolk & Suffolk Team

Appendix 1 - Table of summary of Natural England representations and responses
Part 1 – The Strategy

Appendix 2 – Interim Statement of Common Ground between the Greater Norwich Authorities and Natural England on the GIRAMS. 29/07/2021.

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APPENDIX 1 Table of summary of Natural England representations and responses

Part 1 – The Strategy

Section 2 – Greater Norwich Profile

| POLICY/ MAP/ PARA NO. etc | REP ID/s | SUPPORT / OBJECT | MAIN ISSUES RAISED | COUNCIL RESPONSE | POTENTIAL CHANGE TO PLAN | NATURAL ENGLAND RESPONSE |
|------------------------------------|-------------|------------------------|---|---|--|--|
| The Natural Environment, 109 | 24468 | Object | This rep. is the same as rep. 24470 below | See response to rep. 24470 below | | AGREE |
| The Natural Environment, 112 | 24469 | Support | This representation is the same as rep. 24470 below | See response to rep. 24470 below | | AGREE |
| The Natural Environment, | 24470 | Support | 'The natural environment' section needs to be improved and expanded as it currently is unclear or incomplete. It needs to recognise and include the issues that the natural environment, both within and adjoining the Plan area, is facing including biodiversity loss, climate change, habitat fragmentation, pollution etc and | Support noted. Although it is not considered necessary for the soundness of the plan, and the profile is intended to be concise, it is accepted that an additional sentence at the end of para. 109 on locally protected habitats would be helpful. | Make a minor additional modification to add a sentence at the end of para. 109 to read: <i>"It is also important that locally designated habitats are</i> | AGREE We welcome and support the proposed amendment to the text under (109). |

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| | | | <p>how the proposed Plan may impact on and address these issues. Currently, it could be read as the only issues facing our natural environment are those identified under (109), which is clearly not the case.</p> <p>In (109) the Plan needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but a wide range of other sites that are important for wildlife, including County Wildlife Sites (CWS) (locally protected sites).</p> <p>We welcome the amendments and additions, respectively, to (112) and (115) which help to recognise that the protection and delivery of quality GI is key to delivering many of its objectives and growth cannot be regarded as being sustainable without this.</p> | | <p><i>protected and enhanced”.</i></p> | |
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|---|-------------|--------------------|---|---|--|--------------------------------|
| Section 3 – The vision and objectives for Greater Norwich The Vision for Greater Norwich in 2038, 125 | 24514 | Object | Changes in vision text required to better balance between the 3 pillars of sustainable development by adding “ <i>whilst protecting and enhancing them</i> ” at the end of para 125. | No changes are required for soundness, however the GNLP authorities accept that minor modifications should be made for clarity. | Make a minor additional modification to change the final sentence of para. 125 to “ <i>Growth will make the best of Greater Norwich’s distinct built, natural and historic environments, whilst protecting and enhancing them.</i> ” | AGREE change |
| Section 5 – The Strategy | | | | | | |

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|--|-------------|--------------------|--|--|--|---|
| Policy 1 The Sustainable Growth Strategy | 24471 | Object | <p>The current wording of the policy needs to be strengthened with regard to the delivery of green infrastructure (GI). Currently it is rather vague and weak with regard to the essential role that quality GI must play if sustainable development is to be delivered under the Plan and meet the needs and aims as set out in the accompanying text under (161).</p> <p>The policy needs to cross reference Policy 3 in order to provide a strong and clear steer of what will be required to deliver the growth strategy, whilst protecting and enhancing the area's natural environmental assets, and to make the Plan sound. It refers to other relevant Plan policies in relation to housing, the economy, areas of growth and other strategic infrastructure, so links to Policy 3 should be included too.</p> | <p>Although it is not considered necessary for soundness purposes, it is agreed that a cross reference to policies 2, 3 and 4 in the final sentence of the policy would provide greater clarity.</p> <p>The GN authorities do not believe that the further changes sought by Natural England (as set out in the NE Response column) are necessary. However, if the Inspectors are of the opinion that they are necessary to make the Plan sound, then the authorities do not object to these being put forward as a Proposed Modification to the Plan.</p> | <p>There is the potential to add a cross reference to policy 3 in relation to green infrastructure provision in the final sentence of the policy as a minor modification so that it reads:</p> <p>The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services as set out in policies 2, 3 and 4.</p> | <p>DISAGREE</p> <p>Whilst we welcome and support the proposed amendment, we consider that the policy needs further amendment to be robust, give the necessary weight to protection of natural assets and link to the delivery of green infrastructure.</p> <p>We would prefer to see the following text included as per our Reg 19 response: " Sustainable development and inclusive growth are supported by...</p> <p>- supporting infrastructure will be provided in line</p> |

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| | | | | | Further main modifications, as suggested by NE, are not objected to if the Inspectors think them necessary to make the Plan sound. | <p>with policies 2, 3 and 4; - environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered in line with policy 3."</p> <p>and, under the final sub-heading INFRASTRUCTURE, amend as follows:</p> <p>"The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services. Improvements to existing green infrastructure and</p> |

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| | | | | | | the creation of new green infrastructure will be delivered in line with policy 3 and other relevant documents.” |
| Intro Table 8 Issue 3 | 24473 | Object | <p>Not Sound</p> <p>It is appropriate for developments to be required to deliver GI off-site, or to financially contribute to this, where it is not possible to deliver quality GI which meets the needs of residents. GI provision is essential to divert and deflect the daily recreational visits away from the sensitive Habitats Sites,</p> | <p>Table 8 is a list of key issues relating to policy 2 and the achievement of sustainable communities. Green infrastructure is one element of this.</p> <p>The text is adequate and the GN authorities do not accept that the Plan is unsound in this</p> | <p>Amend explanatory text under Table 8 Issue 3 as a minor additional modification, adding:.</p> <p>“Where it is not possible to deliver</p> | <p>AGREE</p> <p>We welcome and support the proposed amendment to the explanatory text, although we consider that the policy wording needs to be amended to reflect this.</p> |

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| | | | <p>and rare species, to avoid adverse effects.</p> <p>It would be useful to state in (3) that development is expected to avoid loss or severance of existing GI networks, and to contribute to the enhancement and extension of existing GI on-site in order to strengthen these networks. (wording suggested)</p> <p>It is unclear if the above Green Infrastructure Strategy in (3) refers to The Greater Norwich Green Infrastructure Strategy (dated November 2007) or the Greater Norwich Green Infrastructure Study (produced in December 2020).</p> | <p>respect. However, as Natural England has questioned the clarity of the text the authorities are willing for an amendment to be made to clarify the explanatory text re GI provision, reflecting the wording suggested by Natural England. The authorities propose that this be done by them as a minor “additional” modification.</p> <p>The GI Strategy referred to is the current one (2007) though the reference would be applicable to future reviews of the strategy.</p> | <p>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”; and</p> <p>“The aim is to provide an overall strengthening of GI networks, which will entail avoiding loss or severance and the enhancement of existing GI networks, as well as</p> | |

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| | | | | | creating new elements". | |
| | | | | | | |
| Policy 2 | 24472 | Object | <p>Not sound</p> <p>It is unclear what are the 'relevant green infrastructure strategies and delivery plans' and the policy should also cross reference Policy 3. Rewording to point 3 suggested.</p> | <p>What is relevant will need to be determined at the time of a proposal as strategies and delivery plans will evolve. All policies of the Plan apply where relevant to a proposal; it is not necessary for there to be cross-references within policies.</p> <p>The GN authorities do not believe that the further changes sought by Natural England (as set out in the NE Response column) are necessary. However, if the Inspectors are of the opinion that they are necessary to make the Plan sound, then the</p> | <p>No change.</p> <p>However, if the Inspectors are of the opinion that the changes sought by NE are necessary to make the Plan sound, then the authorities do not object to these being put forward as a Proposed Modification to the Plan.</p> | <p>DISAGREE</p> <p>Whilst we welcome and support the proposed amendment to the explanatory text under Table 8, we maintain that the policy wording (under point (3)) needs to be amended to ensure the delivery of quality GI both on-site and off-site, and the protection and enhancement of existing GI networks.</p> <p>We suggest under (3) of Policy 2 the following amended wording: "Create and Contribute to</p> |

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| | | | | authorities do not object to these being put forward as a Proposed Modification to the Plan. | | multi-functional green infrastructure links, <i>whether provided on-site or off-site</i> , including through landscaping, to make best use of site characteristics and integrate into the surroundings, <i>whilst protecting and enhancing existing green infrastructure networks, taking account of having regard to relevant green infrastructure strategies and delivery plans.</i> |

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| Policy 3 | 24474 | Object | <p>Not sound</p> <p>Policy 3:</p> <ul style="list-style-type: none"> • does not make it clear that there is a hierarchy of avoiding, mitigating and then compensating significant harm (NPPF para 171); • does not contain criteria against which any proposed development affecting designated sites will be judged (NPPF para 175); • does not make clear the distinctions between the hierarchy of designated sites and landscapes so that protection is commensurate with their status and gives appropriate weight to their importance (NPPF para 175 and para 172); • does not make clear that the sustainable development presumption does not apply where development requiring appropriate assessment is required (NPPF para 177); and does not make explicit reference | <p>The GNLP is a strategic plan, and Policy 3 is written accordingly. In accordance with the NPPF Local Plans should be concise and avoid excessive detail. It is not necessary for Policy 3 to go into the level of detail suggested. Such information is contained in other policy documents such as the NPPF and other local plans, such as Development Management Policies Local Plans, or regulatory requires such as the Habitats Regulations. Therefore, it is felt that the policy is worded appropriately. However, if the Inspector are of the view that further information / clarification is required,</p> | <p>No change</p> <p>(But no objection in principle to some modifications being made if felt beneficial by the Inspectors, as set out in the Council response).</p> | <p>DISAGREE</p> <p>We maintain our objection to the current wording of Policy 3, and the supporting text.</p> <p>In order to address the issues summarised under the <i>Main Issues Raised</i> column, we consider that Policy 3, and the supporting text, needs to be substantially amended and expanded. Natural England previously provided detailed advice in our response to the Reg 19 consultation, emailed on 22.03.2021(our ref: 341876) , and in our Reg 18 Consultation</p> |

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| | | | <p>to either project level Habitats Regulations Assessments (HRAs), or potential compensatory measures, as being required in relation to those allocations which have likely significant effects on European habitats sites.</p> <p>The Local Plan needs to provide a comprehensive strategic document, rather than Maps 8A and 8B, that sets out how the development proposals in the Plan will contribute to creating new GI, and protecting, expanding or enhancing existing GI, at site level, and across the Plan area, to form a cohesive GI network that delivers multiple benefits for people and the natural environment.</p> <p>New development should provide environmental net gains in terms of both GI and biodiversity. Proposals should demonstrate how the development would</p> | <p>either as Proposed Main Modifications or Minor Modifications, then the GNLP authorities have no objection to this in principle.</p> <p>It is not the role of the plan to set out the detailed GI strategy and GI proposals for the Greater Norwich Area. This is dealt with in other documents such as the GI Strategy (that is to be updated) and the delivery plans that are produced under this.</p> <p>The Policy requires the provision of GI / open space and net gains for biodiversity. The</p> | | <p>response letter dated 16.03.2020 (our ref:307463).</p> <p>We look forward to working with the GNLP authorities to address these issues.</p> |

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| | | | <p>contribute towards new GI opportunities or enhance the existing GI network as part of the development.</p> <p>Recommend that the following text is added to Policy 3:</p> <p>"Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the project will have to be refused or pass the tests of regulation 62, in which case any necessary compensatory measures will need to be secured."</p> <p>This amendment is also necessary due to the way in which mitigation measures for various designated sites (identified in the</p> | <p>specific proposals will arise and be considered as part of planning application proposals.</p> <p>The suggested text sets out the legal requirement for Habitats Regulations Assessments; it is not necessary nor appropriate to repeat this in Policy. The Plan has been subject to an HRA and specific evidence has been commissioned to consider impacts from visitor pressure, a known potential problem (GIRAMS). The results of the GIRAMS have been reflected in the Policy, including a requirement on</p> | | |

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| | | | Plan's Habitats Regulations Assessment), have been incorporated into the wording of the relevant policies in the Plan. | development for a contribution towards mitigation. The Policy requirement will apply to all relevant development. Therefore, no amendment is necessary to make the plan sound. However, if the Inspectors are of the opinion that further clarification would be beneficial, then the GNLP authorities have no objection in principle to a change to supporting text e.g. as a minor modification. | | |
| Policy 4 Strategic Infrastructure | 24475 | Object | <p>The plan does not provide any level of detail regarding the delivery of strategic Green Infrastructure (GI).</p> <p>Para 224. We think this should reference the Greater Norwich Local Plan Infrastructure Needs</p> | The publication version of the GNLP includes a vision which seeks "significant further improvements to our extensive green infrastructure network", and policies 1, 2, 3, 4 | Minor additional modifications to paras. 224 and 259, footnote 81 and the glossary are | DISAGREE Whilst we welcome and support the minor modifications proposed, we maintain our objection to the current wording |

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| | | | <p>Report (GNLPINR) rather than the Greater Norwich Local Plan Infrastructure Report (GNLPIR), which does not appear to exist</p> <p>No reference to GI in Appendix 1.</p> <p>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.</p> | <p>and 7 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.</p> <p>Specifically:</p> <ul style="list-style-type: none"> 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. Policy 3 - Based on the NSPF work, supporting text and maps set out the GI network which is to be further developed and | <p>required for accuracy so that they refer to the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR).</p> <p>If the Inspectors are of the opinion that the further changes sought by NE are necessary to make the Plan sound, then the authorities do not object to these being put forward as a Proposed Modification to the Plan.</p> | <p>about GI under the heading <i>Other Strategic Infrastructure</i> in Policy 4.</p> <p>Presently, it is unclear how a multi-functional strategic GI network will be further developed when the only reference provided is to Maps 8A and B. Both maps are simply too elementary and broad brush to be meaningful. Yet throughout this Plan reference is made to them in relation to GI delivery.</p> <p>In Policy 4, under the heading <i>Other Strategic Infrastructure</i>, we</p> |

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| | | | | <p>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 into the future. The policy also requires biodiversity net gain on all development.</p> <ul style="list-style-type: none"> Policy 4 on strategic infrastructure provides further support for enhancing the GI network, stating "In line | | <p>recommend that the wording of the policy needs to be amended as follows (or a similar form of wording used):</p> <p><i>"Improvements to existing strategic green infrastructure and the creation of new green infrastructure will be delivered in line with policy 3 and other relevant plans and strategies including XX*,"</i></p> <p>*XX - equals the most relevant and current ones to be identified by the GNLP authorities.</p> |

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| | | | | <p>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”.</p> <p>Furthermore, sites allocated in the plan are required to enhance GI, with particular opportunities for enhancement identified.</p> <p>Overall, it is felt that that policy 4, with the other policies in the plan, in particular the GI map in policy 3, provides the level of detail on GI suitable for a strategic local plan.</p> <p>It is agreed that minor text modification is required for accuracy.</p> | | |

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|---|-------------|--------------------|---|--|--------------------------------|--------------------------------|
| | | | | The GN authorities do not believe that the further changes sought by Natural England (as set out in the NE Response column) are necessary. However, if the Inspectors are of the opinion that they are necessary to make the Plan sound, then the authorities do not object to these being put forward as a Proposed Modification to the Plan. | | |
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| Policy 6 The Economy (inc Retail) | 24463 | Support | Welcome the recognition given under (5) of Policy 6 to protect, enhance and expand the Green Infrastructure network | Support welcomed. | No change | AGREE |
| | | | | | | |
| Policy 7 – Strategy for the areas of growth | | | | | | |
| Policy 7.1 The Norwich urban | 24464 | Support | Under the East Norwich heading in the policy, we welcome the | Support noted | No change | AGREE |

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| area including the fringe parishes | | | reference to protecting and enhancing green infrastructure (GI) assets, corridors and open spaces within the area. We also support the references to the delivery of GI under the section headed Elsewhere in the urban area including the fringe parishes. | | | |
| | | | | | | |
| Policy 7.2 The Main Towns | 24465 | Support | We welcome the reference to enhancing existing green infrastructure (GI) in the supporting text and in the final paragraph of the policy. Instead of the basic maps 8A and 8B, if reference could made to a specific GI strategy or similar document, which provides further details of what should be maintained and enhanced, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with para 170 (d) and 171 of the NPPF. | Support from Natural England is noted. However, we would not object if the Inspectors wish to include reference to the GI strategy within the policy. | No change | AGREE - subject to the inclusion of reference to the GI strategy within the policy. |
| Policy 7.3 The Key Service Centres | 24466 | Support | Instead of the basic maps 8A and 8B, reference should be made in the policy to a specific GI strategy | The policy as worded is sound. However, we would not object if the Inspectors wish to | No change | AGREE - subject to the inclusion of reference to the GI |

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| | | | or similar document, to assist delivery of a strategic GI network. | include reference to the GI strategy within the policy. | | strategy within the policy. |
| | | | | | | |
| Policy 7.4 Village Clusters | 24467 | Support | <p>We welcome reference to enhancing existing green infrastructure in the supporting text and the final paragraph of the policy.</p> <p>Instead of basic maps 8A and 8B, if reference could be made to a specific GI strategy or similar, it would assist in the delivery of a strategic GI and coherent ecological networks in accordance with NPPF.</p> | <p>Support for the reference to green infrastructure is noted. With regard to comments about maps 8A and 8B the policy as worded is considered to be sound and therefore it is not necessary to make the change suggested however the GNLP authorities would not object to a proposed modification being put forward by the Inspectors to refer to the GI strategy .</p> | No change | AGREE - subject to the inclusion of reference to the GI strategy within the policy. |
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Interim Statement of Common Ground between the Greater Norwich Authorities and Natural England on the GIRAMS

29/07/2021.

Natural England confirmation email:

Thank you for your email and the latest version of the GIRAMS SoCG with Natural England.

At the area team level, we are happy for the latest version to be submitted as an interim SoCG, with the caveat that we will be seeking internal legal advice on the latest draft and is subject to our legal team's agreement.

Well done for all the hard work that you and other officers have put in to getting it to this point.

Regards

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Interim agreed statement:

The Greater Norwich partnership has cooperated with the other Planning Authorities across Norfolk including the Broads Authority over recreational impacts through a properly constituted Duty to Cooperate Board. The Greater Norwich partnership accepts that a county wide approach is the best way to mitigate against recreational pressures on key Norfolk habitat sites as a result of incremental housing growth.

Having accepted the nature of development pressures and considered an Action Plan to calculate a quantum of cost, each Local Planning Authority has agreed that they will bring forward procedures for the collection of the county wide tariff of £185.93 per new dwelling.

The Greater Norwich partnership also accepts that any action plan must be implemented in a manner which meets legal requirements and delivers the objects of

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the regulations. To that end the parties agree that robust governance, prioritisation and success factors/measures need to be developed alongside a workable process model so it is clear to those who will pay the charge in particular locations where their contributions will be applied and how.

Having established a quantum of financial requirement, the Partners and other LPAs are mindful that the governance, success factors for the scheme and other process points including apportionment, joint decision-making and prioritisation still need to be finalised. Whilst these matters are being finalised, the Greater Norwich partners, alongside the other LPAs, will implement the GIRAMS package as the best available evidence.

A review of the mitigation package which all partners, including Natural England, commit to, will be carried out within 15 months from [insert date].

This review must meet the following criteria: it must be legally robust and the mitigation package must be deliverable, effective in that they mitigate incremental development over the forty-or-so sites across the county, proportionate to local development pressures and based upon professional advice and underpinned with evidence. The review will consider the appropriateness of a warden scheme alongside other mitigations and the associated revenue/capital funding of a new plan with the apportionment of resources to ensure the effectiveness of the overall mitigation package is maximised over the life of the scheme.

All parties commit to implementing any revisions to the mitigation package identified by the review within 18 months from [insert date].