

## Greater Norwich Local Plan - Inspectors Matters Issues and Questions (MIQ) (Part 1)

Natural England's Representations – 17 January 2022 (our ref: 377767)

### Matter 4 Sustainable Communities and the environment

Issue 1 : Is Policy 2 justified, effective and consistent with national policy?

**6. Is the proposed modification to Table 8 (in response to comments made by Natural England) justified? In order to be effective, should this be moved to the policy wording itself?**

Natural England supports the proposed amendment to the explanatory text under 3. *Green infrastructure* in Table 8 (p58-59), However, Natural England maintains that the policy wording (under point (3) needs to be amended to ensure the delivery of quality Green Infrastructure (GI) both on-site and off-site, **and** the protection and enhancement of existing GI networks.

We support reflecting this within Policy 2 under (3) (p64) and in place of the current wording advise that the following amended wording is used:

**Recommended amendment to Policy 2 - 3. *Green infrastructure*:**

*“Create and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, to make best use of site characteristics and integrate into the surroundings, whilst protecting and enhancing existing green infrastructure networks, taking account of relevant green infrastructure strategies and delivery plans.”*

**7. Is it justified to require housing development to meet the higher optional standard for water efficiency, and non-residential development to meet the BREEAM “Very Good” water efficiency standard, or any equivalent successor?**

Development proposals in the Local Plan were assessed in the Greater Norwich Water Cycle Study Final Report (March 2021), produced by AECOM, as both new residential and non-residential developments within the Local Plan area are expected to result in an increased demand for water resources in regard to water supply capacity, wastewater capacity and environmental capacity. Under 7.4.2 *Water Supply* (p63) it identified that these measures were justified in order ‘to move towards a more ‘water neutral position’ and to enhance sustainability of development coming forward’.

Norfolk is one of the driest areas in England, and in view of predicated climate change trends and increasing levels of drought during the plan period, together with the evidence listed in the GNLP Pre-submission Drat Strategy in *Table 8 - Key issues addressed by policy 2 under 9. Water* (p59-60), the higher optional standard for water efficiency is justified.

**8. Is it justified for Policy 2 to refer to a future optional water efficiency standard when any such standard, and the conditions for its adoption, are currently unknown?**

For similar reasons provided in our response to (7) above, we consider this to be justified.