

Greater Norwich Local Plan

Topic Paper: How climate change issues have been addressed in the GNLP

Summary The inclusion of climate change issues in the GNLP, and the legislative and national policy requirements for this, are explained .

Purpose

1. This topic paper is part of a series of papers produced for the examination of the Greater Norwich Local Plan (GNLP). Other Topic Papers of particular relevance include Topic Paper Policy 1 Growth Strategy ([D3.1](#)), Topic Paper Policy 2 Sustainable Communities ([D3.3](#)) , and Topic Paper Policy 3 Environmental Protection ([D3.4](#))
2. The Topic Paper contains the following: a brief introductory “background” to the topic paper; a summary of the context including legislative considerations, national planning policy, current local policies, and the main evidence sources that have guided the policy approach, including Sustainability Appraisal; and consultations undertaken. Through these it is explained how the policy approach has been developed.

Background

3. Climate change and its implications are fundamental issues to be addressed within Local Plans. This is required through legislation and national planning policy. Accordingly, the matter is central to the strategic policies that are to guide development in the Greater Norwich area. As a Local Plan, the GNLP deals with development and land-use as regulated through the planning system, and it has to comply with that system as set out in legislation and national planning policy. The local plan can do this by ensuring that new development is located and designed to mitigate climate change and to be adapted to a changing climate. The GNLP does not, and cannot, address wider issues relating to climate change that are outside the remit of the planning system such as emissions from existing development, national energy and transport policy, agricultural practices, and individual’s choices. Therefore, the local plan contributes to addressing climate change as part of wider overall measures being taken forward at national, local or individual levels.

Context

Legislation

4. The legal obligations on local planning authorities in respect of local development plans are principally set out in Part II of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) and the Town and Country Planning (Local Planning)

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(England) Regulations 2012 (the 2012 Regulations). Section 19(1A) of the 2004 Act provides: *“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”*. Therefore, it is clear that the requirement for local plans is for the policies, taken as a whole, to contribute to the mitigation of and adaption to climate change in general. Such a contribution will be addressed through various elements of the local plan. A footnote to the Climate Change Statement in the GNLP ([A1](#)), footnote 50, lists other legislation together with national policy and guidance, that regard should be had to in relation to climate change policy.

National Policy (NPPF)

5. In producing the GNLP the National Planning Policy Framework (NPPF) has been followed. The Regulation 19 GNLP was published under the February 2019 (NPPF) but it also accords with the NPPF update published on 20 July 2021. The NPPF sets out the policy framework within which local plans should be prepared. Chapter 14 Meeting the challenge of climate change, flooding and coastal change includes: *“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”* (para 152). And, *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”* (para 153).
6. Therefore, local plans have an important role in ensuring new development both mitigates climate change and is adapted to a changing climate. As a result, plans need to take a wide-ranging policy approach to address the NPPF requirements as climate change considerations are intrinsic to both the strategic location of growth and specific policy approaches taken on a range of issues.

Current local policies

7. At a local level, the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011 with amendments adopted in January 2014, sets out the current strategic planning approach. The Spatial Vision (Chapter 4) contains spatial planning objectives, including: Objective 1 to minimise the contributors to climate change and address its impact. Other objectives relate to this general objective.
8. Policies in the JCS apply these objectives. Of particular relevance are: Policy 1 Addressing climate change and protecting environmental assets; Policy 2 Promoting good design; Policy 3 Energy and Water; Policy 6 Access and transportation; and Policy 7 Supporting communities. These strategic policies are

taken forward in more detail through policies in the adopted Development Management Policies Local Plans and other supporting documents of the three planning authorities.

9. The GNLP further develops the existing local planning policies, amending and updating these in light of the NPPF, relevant evidence, including studies or strategies and the Sustainability Appraisal produced on the GNLP, and the results of consultation.
10. Guidance for dealing with climate change issues strategically has been provided through the approach set out in the Norfolk Strategic Planning Framework – 2019 (B2.2) and 2021 (B2.3). These include a series of agreements and accompanying objectives. The 2019 version includes at Section 2.3 (and also the objective at section 7): *“Agreement 3 - By 2036, through co-operation between Local Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):*

To reduce Norfolk’s greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:

- *locating development so as to reduce the need to travel;*
- *effecting a major shift in travel away from car use towards public transport, walking and cycling;*
- *maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and*
- *managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats”.*

Further agreements also relate to this, including Agreement 17 on water stress, Agreement 22 on green infrastructure.

11. The revised version of the Framework, produced in May 2021 (B2.3) updates the agreements and objectives, including at section 2.3 Agreement 3 (replacing previous agreement 2):
“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 by:
 - *locating development so as to reduce the need to travel;*
 - *reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including public transport, walking and cycling;*
 - *maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and*
 - *managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats”.*

12. Also, there is a new section specifically on climate change (section 8) that includes an agreement on information relating to climate change, to be used in reviewing local plans.

Evidence

13. Section 2 of the GNLP is a “Spatial Profile” of the Greater Norwich area. This summarises information on the main social, economic and environmental issues and includes references to supporting information. It follows from a similar portrait produced for the Reg 18A Growth Options consultation in January 2018. It identifies key trends and issues which the GNLP aims to take account of and address. Sections of particular interest are Transport for Norwich and the Transforming Cities programme (paras 78 – 80); Digital Infrastructure (para 81); Emissions and Climate Change (paras 83 – 86); Flood Risk (paras 87 – 91); Renewable Energy (para 92); Environmental Assets (paras 93 – 104); Soils (para 105); Water (paras 106 – 107).
14. As well as the local issues, it is acknowledged that the GNLP [\(A1\)](#) “will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate” (para. 97).
15. Local evidence was commissioned and taken into account to assist in drafting policy, including the studies referenced below.
16. The Greater Norwich Energy Infrastructure Study (2019) [\(B4.1\)](#) was commissioned to provide evidence for the emerging GNLP to support development and the spatial distribution of growth. This included the suggestion: “*consideration of how local planning policy could help facilitate development will be beneficial to optimise the (development) schemes coming forward. The details of the policy would have to be developed by each local authority; however, the following areas are recommended focus areas in order to shape developments and ensure grid constraints are not a barrier:*
- *Minimising energy demand from new development – by exceeding Part L Building Regulations requirements.*
 - *Ensuring energy is used efficiently – look at balancing the demands across a site by identifying complementary tenancies and activities.*
 - *Managing peaks of electrical demand in new developments - use on-site ESCOs to balance supply and demand through the use of renewable energy and batteries.*
 - *Reducing carbon intensity of energy supplies through increasing renewable generation locally and requiring greater carbon reduction from developers”.*
- In terms of reducing energy demand, regard was also had to the UKGBC New Homes Policy Playbook – Driving Sustainability in Local Authorities Feb 2021 [\(B16.1\)](#) and the earlier version of September 2018 which recommended a 19% reduction against the Target Emissions Rate in Part L of the Building Regulations. The latest Playbook referred to a potentially higher figure, but as this arose late in the local plan process the original figure of 19% was included in the Regulation 19 GNLP.

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17. The Greater Norwich Water Cycle Study (WCS) (March 2021) ([B27.4](#)) (which followed on from a WCS Final Draft Jan 2021 and Interim Draft WCS Feb 2020) assessed water supply and waste water capacity in the area, identified issues and constraints, suggested solutions to key constraints, and put forward potential planning policy approaches. The local authority response to the suggestions ([B27.3](#)) was published with the WCS. This included the addition of a further criteria to Policy 2 Sustainable Communities (iv) relating to wastewater capacity; and an addition to Appendix 1 Infrastructure Requirements under the Water section referring to possible capacity issues in some waste-water catchments and Anglian Water's Long-term Plan, that were included in the Regulation 19 GNLP.
18. The aims of the Greater Norwich Area Strategic Flood Risk Assessment (Nov. 2017) ([B21.1](#)) were:
- To provide up to date information and guidance on flood risk for the Greater Norwich area taking into account the latest flood risk information and the current state of national planning policy;
 - To determine the variations in risk from all sources of flooding in the Greater Norwich area, taking into account climate change;
 - To identify the requirements for site-specific flood risk assessments;
 - To consider opportunities to reduce flood risk to existing communities and developments;
 - To enable the local authorities in the Greater Norwich area to apply the Sequential Test;
 - To aid authorities in identifying when the Exception Test is required and when a more detailed Level 2 SFRA will be required, when determining strategic site allocations; and,
 - To inform the Sustainability Appraisal of the authorities' Local Plans, so that flood risk is taken into account when considering strategic site allocations.
- The assessment took into account the potential impacts arising from climate change, and the results of the assessment were taken into consideration in developing the local plan policies, including site allocations.
19. The Greater Norwich Green Infrastructure Study (Dec 2020) ([B7.1](#)) updated and expanded earlier work on green infrastructure produced for the JCS. GNLP Policy 2 provides for on-site green infrastructure which will link and contribute to further development of area wide green infrastructure promoted through policies 3 and 4 of the GNLP.
20. Monitoring of the Plan will be undertaken and information provided on this in the Annual Monitoring Reports. The Green Infrastructure Study and the specific measures arising from it will also be monitored and evaluated over time, including through the work of the Greater Norwich Growth Board. Such monitoring will input into the next review of the Plan. The monitoring of the GNLP will be to assess how successful it is being in achieving its objectives, and whether further action is needed, for example through a review of the Plan. Information on monitoring is given at Appendix 3 Monitoring Framework of the GNLP ([A1](#)); with monitoring of

various indicators, related to GNLP objectives, to be undertaken. Under the GNLP Environment objective, the key indicator relating to climate change is GNLP16 “*To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data. The GNLP will support achievement of any objectives or targets identified in adopted local strategies*”. Following the Reg 19 Publication, some additional “minor” modifications have been proposed ([A13](#), appendix C) including to the Environment objective at para 151 of the GNLP, and to monitoring indicator GNLP 16, to reflect the latest national targets. GNLP16 will now state: “*To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national targets to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels and bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data. The GNLP will support achievement of any objectives or targets identified in adopted local strategies*”. National figures and targets for climate change issues will be based on a range of factors. Local Plan policies for development and land-use can be a significant, but partial, contributor to meeting the national objectives.

21. Other relevant indicators for monitoring include GNLP 21, 22 and 23 on green infrastructure; GNLP 26 and 27 on renewable energy; GNLP30 on flood-risk, GNLP31 on water; and GNLP42 on sustainable transport.

Sustainability Appraisal (SA)

22. The Sustainability Appraisal ([A 6.1](#), [A 6.2](#), [A 6.3](#)) was developed through a series of stages, with account being taken of this in the related GNLP stages. This included assessment against key sustainability objectives related to climate change issues, including a specific objective, SA Objective 2: Climate change mitigation and adaptation. The consideration of the Sustainability Appraisal for the GNLP policies is set out in the Topic Papers for each policy, available from here ([D3](#)).

Consultation

23. Details of the consultations undertaken, including representations at the Regulation 19 stage and the authorities’ response to these, are set out in the “Greater Norwich Local Plan Statement of Consultation” ([A8.1](#)). They are also referred to in the Topic Papers for each policy ([D3](#)).
24. Appendix 11a to the Statement of Consultation ([A8.19](#)) sets out the Greater Norwich Authorities responses to the various representations. Particular examples relevant to the climate change issue are:

Introductory / general sections - pages 3, 24,29, 37, 46, 63 - 71, 136

Policy 1 – pg 75, 87 (inc ref to unsuccessful legal challenge to South Oxfordshire Local Plan at 88), 91, 94, 113

Policy 2 – pg 136 – 140

Policy 3 - pg 147

Policy 4 - pg 155, 161, 164, 165

Policy 5 – pg 168/9

Policy 7.4 - pg 249 (re distribution of development)

Policy 7.5 - pg 257 (re rural locations)

Appendix 3 Monitoring Framework – pg 265.

How the climate change issue has been addressed in GNLP

25. Climate change is a primary issue that must be addressed through the local plan. This is required through legislation and national policy. As such local plans are required to contribute to mitigation of climate change (reducing the factors that are causing climate change and addressing the effects of climate change that are predicted to occur) in terms of land-use and development. The GNLP takes on this task by ensuring that addressing the issue of climate change is integral to the Plan, as explained below.
26. Section 2 of the GNLP ([A1](#)), the Greater Norwich Profile, outlines the main social, economic, and environmental issues in Greater Norwich which provide context for the local plan's vision and objectives and policies. This includes a number of themes that are relevant to the climate change issue, and a specific one entitled "emissions and climate change".
27. Section 3 The Vision and Objectives for Greater Norwich states:
- "By promoting this Greater Norwich Local Plan our aim is that it will support growth of a diverse low carbon economy"* (para 124);
- "growth will be clean and resource efficient, with significantly reduced emissions to ensure that Greater Norwich plays a full part in meeting national commitments on tackling climate change and is moving towards a post-carbon economy."* (para 126);
- More specific aims are set out in the different themes and the Plan's objectives (para 151).
28. Section 4 – The delivery of growth and addressing climate change states:
- "To achieve this plan's visions and objectives it is essential that we deliver planned growth through an effective policy framework which will both help decarbonise development and assist in addressing climate change. The delivery and climate change statements below are not policies in themselves, but rather set out how the*

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GNLP addresses these two key issues. These priorities are important in guiding the plan's strategy and content" (para 152).

29. More specifically, a "Climate change statement" sets out "*how the GNLP seizes the opportunities available locally to promote low carbon development and address climate change*" (para 157). The accompanying table explains how different measures, related to land-use and development, are addressed by individual policies within the Plan. This table is contained at appendix 1 of this Topic Paper. Further explanation of each policy is contained in the relevant Topic Papers ([D3](#)).

Conclusions

30. The GNLP has had full regard to the legislative and national policy requirement to contribute to the mitigation of and adaption to climate change. This is addressed through various elements of the local plan. This contribution is specifically in relation to development and land-use only; and does not, and cannot, deal with wider issues that relate to climate change that are outside the remit of the planning system. However, the local plan does contribute to addressing climate change as part of wider overall measures being taken forward at national, local or individual levels.

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Appendix 1 -Climate Change Statement (Extract from GNLP – footnotes excluded)

CLIMATE CHANGE STATEMENT

The way in which local plans such as this can support the transition to a post-carbon future is set out in joint Royal Town Planning Institute (RTPI) and Town and Country Planning Association (TCPA) [guidance](#). Table 5 below shows how the measures the guidance identifies are addressed through the GNLP.

Table 5 GNLP coverage of climate change issues

Measure	GNLP coverage
<p>Requiring the location and design of development to:</p> <ol style="list-style-type: none"> 1. deliver the highest viable energy efficiency, including the use of decentralised energy; 2. reduce the need to travel, particularly by private car; 3. secure the highest possible share of trips made by sustainable travel. 	<p><u>Location of development:</u> Policies 1 and 7</p> <p>The policies covering the location of development ensure that new housing will be close to every-day services and jobs. The great majority of the development is in urban areas and large villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to services to support their retention. The distribution of the great majority of growth thus reduces the need to travel.</p>
	<p><u>Design of development:</u> Policies 1, 2, 3 and 4</p> <p>Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions.</p> <p>To achieve this, development must be designed to promote local service provision, include green infrastructure and reduce the need to travel. It must promote the use of public transport and active travel, along with supporting electric vehicle use.</p> <p>The policy also requires development to be designed and orientated to minimise energy use, promote low carbon</p>

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	generation and energy and water efficiency, including using sustainable materials, promoting solar gain and reducing overheating. By setting high standards for resource efficiency the plan contributes to the Local Industrial Strategy priority to make Norfolk and Suffolk the UK's clean growth region.
Support delivery of decentralised, renewable and low-carbon energy generation and grid infrastructure.	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. As required by the NPPF, wind farm development needs to have clear local support so is encouraged through the Neighbourhood Plan process.
Shape places and secure new development to minimise vulnerability and provide resilience to impacts from climate change.	<p>Policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats.</p> <p>In addition, the GNLP minimises flood risk through the location of development. Most of the development is located away from areas at risk of flooding from rivers. The exception is a small number of brownfield sites by the Rivers Wensum and Yare in the city centre and East Norwich where new development can create new quarters for the city and flood mitigation measures are required. Development in the small number of allocated sites which have some areas of surface water flood risk should be located away from the parts of the site at risk of flooding and all suitable developments are required to use sustainable drainage.</p>
Encourage community-led initiatives such as the promotion of decentralised, renewable and low carbon energy use or securing land for local food sourcing.	Policy 2 encourages communities to promote sustainable energy locally through neighbourhood plans, including wind energy development where there is local support. The requirement for significant amounts of green infrastructure in new development promotes local food sourcing by providing allotments.
Increase sustainable transport use and local transport solutions.	Policies 2 and 4 support the further development of low carbon transport networks. This includes improved walking and cycling facilities, the promotion of bus travel, Park and Ride and rail use, increased use of electric vehicles and demand management measures.
Have an effective monitoring regime to ensure evidence on reducing carbon dioxide	Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. Our ambition

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emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks.	is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local targets, statements and plans. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends.	
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